

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT
OF HINDS COUNTY, MISSISSIPPI

FILED

DR. ORLY TAITZ, ESQ

PLAINTIFF

VS.

MAR 23 2012
BARBARA DUMM, CIRCUIT CLERK
BY  D.C.

CIVIL ACTION NO. 251-12-107 CIV

DEMOCRATIC PARTY OF MISSISSIPPI,
SECRETARY OF STATE OF MISSISSIPPI

DEFENDANTS

**RESPONSE OF DEFENDANT MISSISSIPPI DEMOCRATIC PARTY EXECUTIVE
COMMITTEE TO PLAINTIFF'S MOTION FOR SANCTIONS AND PLAINTIFF'S
MOTION TO AMEND THE COMPLAINT**

COMES NOW the Defendant, the Mississippi Democratic Party Executive Committee, by and through its undersigned attorney, and hereby responds to the Plaintiff's Motion for Sanctions against it and the Plaintiff's Motion to Amend the Complaint (both embodied in the Plaintiff's opposition to the Defendant's Motion to Dismiss) as follows:

The Plaintiff's Motion for Sanctions

1. The Plaintiff alleges that the Democratic Party of Mississippi should be sanctioned because it defrauded the people of the State of Mississippi by not taking any action to remove President Obama's name from the list of candidates it submitted to the Secretary of State. First, the Democratic Party has no role in devising the list of candidates to be put on the presidential preference primary ballot, that responsibility being statutorily lodged with the Mississippi Secretary of State. *Miss. Code Ann.* §23-15-1089. Second, and most important, the Mississippi Democratic Party is confident that President Obama, having been born in the State of Hawaii, is a natural born citizen of the United States, completely

qualified to hold the office of President.

2. The Plaintiff further alleges that the Democratic Party of Mississippi filed a frivolous Motion to Dismiss and is harassing the Plaintiff in some unspecified way, and intimidating the Plaintiff with its own Motion for Sanctions. All of this is patently absurd and should be treated as a knee jerk reaction, or tactical deflection, to yet another prospect of sanctions being meted out on her. *Liberi v. Taitz*, 759 F.Supp.2d 573 (E.D.Pa. 2010) (court threatens sanctions against Taitz); *Rhodes v. MacDonald*, 670 F.Supp.2d 1363 (M.D.Ga. 2008) (court imposes \$20,000 in sanctions against Taitz).

The Plaintiff's Motion to Amend the Complaint

3. The Plaintiff seeks to amend the Complaint to add additional relief—an injunction preventing President Obama from appearing on the November ballot or counting any votes for Obama. Since the underlying action should be dismissed to begin with, as set forth in both the Secretary of State's and the Democratic Party's dispositive motions, amending the Complaint to address the general election would be futile. *Meredith v. Meredith*, 987 So.2d 477, ¶14 (Miss. App. 2008).
4. Additionally, the Plaintiff seeks to add a RICO¹ cause of action, naming a long list of federal conspirators. However, such a far-fetched pleading should be rejected out of hand and merits no serious consideration by the Court. Notably, the Plaintiff has failed to plead fraud with particularity, as required by M.R.Civ.P. 9(b). *Cayman Exploration Corp. v.*

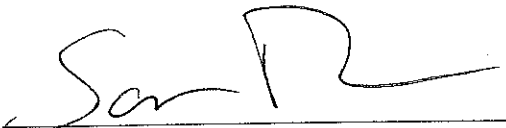
¹ The Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1961-1968, is a highly complex criminal and civil law designed to attack organized criminal activity and preserve marketplace integrity by investigating, controlling, and prosecuting persons who participate or conspire to participate in racketeering. *Black's Law Dictionary* (9th ed. 2009). A cause of action under 18 U.S.C. §1962 (c) requires a RICO plaintiff to plead "(1) the conduct (2) of an enterprise (3) through a pattern (4) of racketeering actions." *Richmond v. Nationwide Cassel, L.P.*, 52 F.3d 640, 644 (7th Cir. 1994).

United Gas Pipe Line Company, 873 F.2d 1357, 1362 (10th Cir. 1989) (Rule 9(b) applies to RICO claims). This means that the complaint must set forth the time, place and contents of the false representations, the identity of the party making false statements, and the consequences thereof. *Id.* Moreover, the Plaintiff has failed to show that she has any standing to bring a RICO claim against any of the persons she seeks to name as a defendant, that she has suffered any economic injury or that any of the proposed defendants are the proximate cause of any purported injury. *Holmes v. Securities Investor Protection Corp.*, 503 U.S. 258, 268 (1992). The Plaintiff, having provided no particular facts, simply cannot be allowed to amend.

WHEREFORE, PREMISES CONSIDERED, the Defendant prays that the Court will deny Plaintiff's Motion for Sanctions and Motion to Amend the Complaint.

RESPECTFULLY SUBMITTED, this the 22nd day of March, 2012.

**THE MISSISSIPPI DEMOCRATIC PARTY
EXECUTIVE COMMITTEE, DEFENDANT**

By: 
Samuel L. Begley (MSB No. 2315)

OF COUNSEL:
BEGLEY LAW FIRM, PLLC
P. O. Box 287
Jackson, MS 39205
(601)969-5545 (Telephone)
(601)969-5547 (Facsimile)

CERTIFICATE OF SERVICE

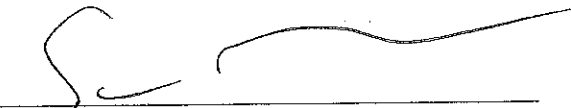
The undersigned hereby certifies that on the date set forth hereinafter, a true and correct copy of the above and foregoing document was caused to be served via email and U.S. mail on the following:

The Honorable R. Kenneth Coleman
Special Circuit Judge
P.O. Box 1995
New Albany, Mississippi 38652

Orly Taitz, Esq.
29839 Santa Margarita Parkway, Suite 100
Rancho Santa Margarita, CA 92688

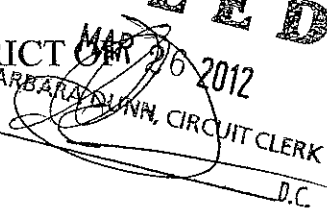
Harold E. Pizzetta, Esq.
Justin L. Matheny, Esq.
Office of the Attorney General
550 High Street, Suite 1200
P.O. Box 220
Jackson, MS 39205

This the 22nd day of March, 2012.



SAMUEL L. BEGLEY

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT
HINDS COUNTY, MISSISSIPPI

FILED
MAR 26 2012
BARBARA DUNN, CIRCUIT CLERK
BY  D.C.

DR. ORLY TAITZ, ESQ

PLAINTIFF

VS.

CIVIL ACTION NO. 251-12-107-CIV

DEMOCRATIC PARTY OF MISSISSIPPI,
SECRETARY OF STATE OF MISSISSIPPI

ORDER

This matter came before the Court, by agreement of counsel, for the setting of a time and date for the hearing of the above styled and numbered cause.

IT IS, THEREFORE, ORDERED that this cause be, and it is hereby, set for hearing on April 16, 2012, at 9:00 a.m. in the Courthouse of the First Judicial District of Hinds County, Mississippi in Jackson, MS.

The Clerk of this Court is hereby ORDERED to furnish a true and correct copy of this ORDER to counsel of record for the parties.

SO ORDERED, on this the 21st day of March, 2012.


R. KENNETH COLEMAN
SPECIAL CIRCUIT JUDGE

ROBERT KENNETH COLEMAN
CIRCUIT COURT JUDGE,
SENIOR STATUS
P.O. BOX 1995
NEW ALBANY, MS 38652

662-316-2636
cjrkcoleman@hotmail.com

March 21, 2012

Hon. Barbara Dunn
Circuit Clerk
P.O. Box 327
Jackson, MS 39205

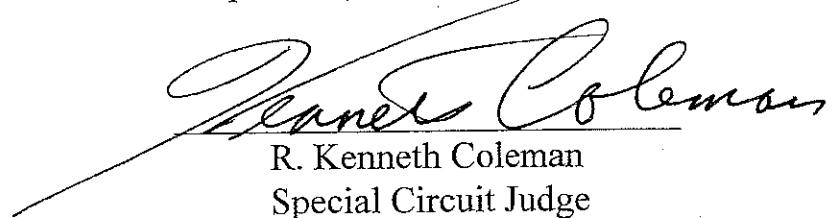
Re: Taitz v. MS Democratic Party, et al
251-12-107-CIV

Dear Ms. Clerk:

Please docket and file the enclosed ORDER in you usual manner. By copy of this I am furnishing to the Court Administrator, Ms. Francis Ashley, a copy of the ORDER.

Thanks for your assistance with this and I will look forward to meeting you.

Respectfully yours,



R. Kenneth Coleman
Special Circuit Judge

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT
OF HINDS COUNTY, MISSISSIPPI

DR. ORLY TAITZ, ESQ

PLAINTIFF

VS.

DEMOCRATIC PARTY OF MISSISSIPPI,
SECRETARY OF STATE OF MISSISSIPPI

CIVIL ACTION NO. 251-12-107 CIV

FILED

MAR 26 2012

BARBARA DUNN, CIRCUIT CLERK

DEFENDANTS

**MOTION OF THE DEFENDANT MISSISSIPPI DEMOCRATIC PARTY EXECUTIVE
COMMITTEE TO REQUIRE AFFIDAVIT OF PLAINTIFF PURSUANT TO MISS.
CODE ANN. § 97-9-15**

COMES NOW the Defendant, the Mississippi Democratic Party Executive Committee, by and through its undersigned attorney, and, Pursuant to *Miss. Code Ann. § 97-9-15*, hereby moves for an Order requiring the Plaintiff to submit an affidavit stating that she has not received any consideration or inducement to commence her civil action, and would show unto the Court the following:

1. *Miss. Code Ann. § 97-9-11* makes it unlawful for any person to provide economic assistance as an inducement for a plaintiff to commence or prosecute a civil action before any court, administrative board or agency of the State of Mississippi.
2. *Miss. Code Ann. § 97-9-13* punishes any person convicted of violating the provisions of Section 97-9-11 by imprisonment for one year in the state penitentiary.
3. *Miss. Code Ann. § 97-9-15*, a copy of which is attached in its entirety as Exhibit "A," grants a party to any proceedings covered by Section 97-9-11 the right to bring a motion requiring the plaintiff to file an affidavit swearing that the plaintiff has not received any valuable

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date set forth hereinafter, a true and correct copy of the above and foregoing document was caused to be served via email and U.S. mail on the following:

The Honorable R. Kenneth Coleman
Special Circuit Judge
P.O. Box 1995
New Albany, Mississippi 38652

Orly Taitz, Esq.
29839 Santa Margarita Parkway, Suite 100
Rancho Santa Margarita, CA 92688

Harold E. Pizzetta, Esq.
Justin L. Matheny, Esq.
Office of the Attorney General
550 High Street, Suite 1200
P.O. Box 220
Jackson, MS 39205

This the 26th day of March, 2012.



SAMUEL L. BEGLEY

MISSISSIPPI CODE OF 1972

As Amended

SEC. 97-9-15. Champerty and maintenance; affidavit of party.

Every person who commences or prosecutes or assists in the commencement or prosecution of any proceeding in any court or before any administrative agency in the State of Mississippi, or who may take an appeal from any such rule, order, or judgment thereof, shall, on motion made by any of the parties of such proceedings, or by the court or agency in which such proceeding is pending, file with such court or agency, as a condition precedent to the further prosecution of such proceeding, the following affidavit:

I, (---), petitioner (or complainant, plaintiff, appellant or whatever party he may be) in this matter, do hereby swear (or affirm) that I have neither received, nor conspired to receive, any valuable consideration or assistance whatever as an inducement to the commencement or further prosecution of the proceedings in this matter.

(Signature of Affiant)

Affiant

Sworn to and subscribed before me on this, the (_____) day of
(_____), 19 (____).

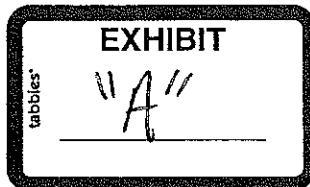
(Signature of Official)

(Title of Official)

In the case of any firm, corporation, group, organization, or association required to make the above affidavit, such affidavit shall be made by the person having custody and control of the books and records of such firm, corporation, group, organization, or association.

SOURCES: Codes, 1942, Sec. 2049-03; Laws, 1956, ch. 253, Sec. 3.

[Chapter Index](#) | [Table of Contents](#)



**CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT**

FILED

APR 13 2012

**BARBARA DUNN, CIRCUIT CLERK
BY _____ PETITIONER D.C.**

DR. ORLY TAITZ, ESQ.

V.

CIVIL ACTION NO. 251-12-107 CIV

**DEMOCRAT PARTY OF MISSISSIPPI;
SECRETARY OF STATE MISSISSIPPI**

RESPONDENTS

The Mississippi Secretary of State's Answer and Defenses to Petition

Mississippi Secretary of State Delbert Hosemann submits this Answer and Defenses to the petition filed in this cause and states:

ANSWER

The Secretary of State responds to the averments contained in the Petition, paragraph-by-paragraph, as follows:

The averments contained in the unnumbered paragraph on pages 1 and 2 of the Petition beginning with "Petitioner herein is seeking. . ." state legal conclusions and/or otherwise set forth no averments requiring a response by the Secretary of State. If the Secretary of State is mistaken in this regard, the averments in such unnumbered paragraph are denied.

The averments contained in the unnumbered paragraph continuing on pages 2 through 4 of the Petition under the heading "23-15-961" appear to recite certain portions of Miss. Code Ann. § 23-15-961. The statutory provisions speak for themselves and do not require a response by the Secretary of State.

1. Denied as stated. The Secretary of State admits only that the document affixed to the Petition as Exhibit 1 speaks for itself.

2. The Secretary of State is without information sufficient to form a belief as to the truth of the averments contained in paragraph 2, therefore, such averments are denied.

3. The averments in paragraph 3 state a legal conclusion that does not require a response by the Secretary of State. If the Secretary of State is mistaken in this regard, the averments in paragraph 3 are denied.

4. The Secretary of State is without information sufficient to form a belief as to the truth of the averments contained in paragraph 4, therefore, such averments are denied.

5. The averments in paragraph 5 state a legal conclusion that does not require a response by the Secretary of State. If the Secretary of State is mistaken in this regard, the averments in paragraph 5 are denied.

6. The averments in paragraph 6 state a legal conclusion and refers to the Constitution of the United States, which speaks for itself, and therefore do not require a response by the Secretary of State. If the Secretary of State is mistaken in this regard, the averments in paragraph 6 are denied.

7. The averments in paragraph 7 state a legal conclusion that does not require a response by the Secretary of State. If the Secretary of State is mistaken in this regard, the averments in paragraph 7 are denied.

8. The Secretary of State is without information sufficient to form a belief as to the truth of the averments contained in paragraph 8, therefore, such averments are denied.

9. Denied as stated. The Secretary of State admits only that the documents affixed to the Petition as Exhibits 2 and 4 speak for themselves. Any and all remaining averments contained in paragraph 9, including subparts (a) through (f), are denied.

11. [sic] Denied as stated. The Secretary of State admits only that the Supreme Court opinion referenced in paragraph 11 [sic] speaks for itself. Any and all remaining averments

contained in paragraph 11 are denied.

10. [sic] The averments in paragraph 10 [sic] state legal conclusions that do not require a response by the Secretary of State. If the Secretary of State is mistaken in this regard, the averments in paragraph 10 [sic] are denied.

The Secretary of State denies the averments contained in the unnumbered paragraph beginning on page 7 of the Petition with “Based on all of the above. . .” and specifically denies that Petitioner is entitled to any relief whatsoever.

Any and all averments of the Petition that have not been specifically admitted are hereby denied.

FIRST DEFENSE

The Petition fails to state a claim upon which relief may be granted.

SECOND DEFENSE

The Court lacks subject matter jurisdiction over the Petition.

THIRD DEFENSE

The Petition should be dismissed for lack of standing, lack of ripeness, mootness, and/or as the Petition otherwise asserts no justiciable right to relief.

FOURTH DEFENSE

The Petition should be dismissed for insufficiency of process, insufficiency of service of process, and/or failure to join indispensable parties.

FIFTH DEFENSE

The Secretary of State pleads all defenses which he is, or may become, entitled to pursuant to and/or arising under Miss. Code Ann. §§ 23-15-961, 23-15-1089, including, but not

limited to, Petitioner's failure to comply with the procedural requirements of those statutes, as well as any other applicable provisions of the Mississippi Election Code, and/or federal statutes.

SIXTH DEFENSE

Some or all of Petitioner's claims are barred by estoppel, ratification, collateral estoppel, waiver, and/or laches.

SEVENTH DEFENSE

The Secretary of State pleads all defenses which he is, or may become, entitled to pursuant to Miss. R. Civ. P. 8(c) and/or 12(b).

FOR THESE REASONS, Mississippi Secretary of State Delbert Hosemann respectfully requests that his foregoing Answer and Defenses be received and hereby moves the Court to dismiss Petitioner Dr. Orly Taitz's Petition and assessing all costs of this action to Petitioner.

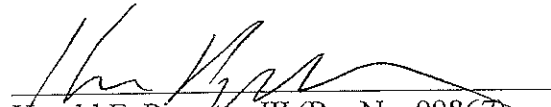
THIS the 13 day of April, 2012.

Respectfully submitted,

Delbert Hosemann, Mississippi
Secretary of State

BY: Jim Hood, Attorney General
State of Mississippi

BY:


Harold E. Pizzetta, III (Bar No. 99867)
Justin L. Matheny (Bar No. 100754)
Office of the Attorney General
550 High Street, Suite 1200
P.O. Box 220
Jackson, MS 39205
Telephone: (601) 359-3680
Facsimile: (601) 359-2003

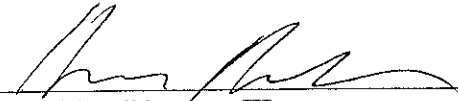
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on the following persons by US Mail, properly addressed and postage prepaid, and electronic mail:

Orly Taitz
29839 Santa Margarita Parkway, Suite 100
Rancho Santa Margarita, CA 92688
orly.taitz@gmail.com

Samuel L. Begley
Begley Law Firm, PLLC
P.O. Box 287
Jackson, MS 39205
sbegley1@bellsouth.net

THIS the 13 day of April, 2012.



Harold E. Pizzetta, III

STATE OF MISSISSIPPI



JIM HOOD
ATTORNEY GENERAL

CIVIL LITIGATION DIVISION

April 13, 2012

Via Hand Delivery

Barbara Dunn, Clerk
Hinds County Circuit Court
407 East Pascagoula Street
Jackson, Mississippi 39205

RE: *Orly Taitz v. Democrat Party of Mississippi, Secretary of State of Mississippi; In the Circuit Court of Hinds County, Mississippi, First Judicial District; Civil Action No. 251-12-107CIV*

Dear Ms. Dunn:

Please find enclosed the original and one copy of The Mississippi Secretary of State's Answer and Defenses to Petition in the above-referenced cause. Please file the original and return the "filed" stamped copy to me via our messenger.

Your assistance in this matter is appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Harold E. Pizzetta, III". To the right of the signature is a large, stylized flourish or set of initials, possibly "fh".

Harold E. Pizzetta, III
Assistant Attorney General

HEPIII:fh

cc: Orly Taitz (via electronic and regular mail)
Samuel L. Begley (via electronic and regular mail)

BEGLEY LAW FIRM, PLLC

Post Office Box 287
Jackson, Mississippi 39205

Samuel L. Begley
sam@begleylawfirm.com

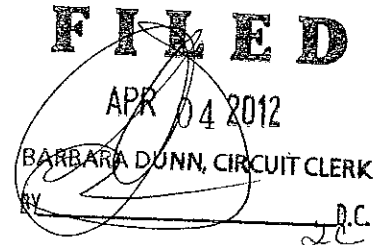
Telephone
(601)969-5545

Facsimile
(601)969-5547

April 4, 2012

Via Email and U.S. Mail

The Honorable R. Kenneth Coleman
Special Circuit Judge
P.O. Box 1995
New Albany, Mississippi 38652



RE: Verified Application of Scott J. Tepper for admission *pro hac vice*; *Dr. Orly Taitz, Esq. v. Democrat* (sic) *Party of Mississippi, Secretary of State of Mississippi*; In the Circuit Court of Hinds County, Mississippi; Civil Action No. 251-12-107 CIV

Dear Judge Coleman:

This letter is to address the enclosed Notice of Deficiency issued by the Supreme Court Clerk of Mississippi on April 3, 2012 in connection with the Verified Application of Scott J. Tepper, Esq. for admission *pro hac vice* in the above styled case.

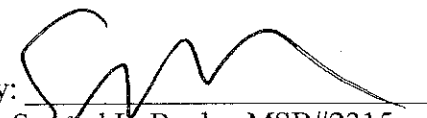
Mr. Tepper, the foreign attorney, intentionally omitted his residential address from his Verified Application for admission *pro hac vice*, indicating thereon that he will gladly supply the Court his residential address *in camera*. All other requirements of the Verified Application have been satisfied.

Mr. Tepper's residential address was intentionally omitted from the Verified Application on the reasonable belief that, if made publically available, the address would in turn be published on the internet by the "birther" community following this case. As evidenced by the Plaintiff's website, www.orlytaitzesq.com, the Plaintiff frequently publishes the names, addresses, phone numbers and other personal information of persons involved in or associated with the litigation she has filed. Moreover, the Plaintiff frequently posts requests on her website instructing her supporters to flood the published address or email with a particular message. I have enclosed examples of two such posts for your review.

We respectfully ask that you waive the requirement that Mr. Tepper's residential address be included in the Verified Application for admission *pro hac vice* of Scott J. Tepper, and allow us to provide it to the Court *in camera*, if so required by the Court. Otherwise, Mr. Tepper's Application should be granted.

Sincerely,

BEGLEY LAW FIRM, PLLC

By: 
Samuel L. Begley MSB#2315

Enclosures

cc: All Counsel of Record (via email)

Supreme Court of Mississippi
Court of Appeals of the State of Mississippi
Office of the Clerk

Kathy Gillis
Post Office Box 249
Jackson, Mississippi 39205-0249
Telephone: (601) 359-3694
Facsimile: (601) 359-2407

(Street Address)
450 High Street
Jackson, Mississippi 39201-1082
e-mail: sctclerk@mssc.state.ms.us

April 3, 2012

RE: Scott J. Tepper
Dr. Orly Taitz, Esq v. Democratic Party of Mississippi
SC Cause #: 2012-AC-00538; Trial Court Cause #: 251-12-107 CIV
Hinds County Circuit Court District 1

NOTICE

Pursuant to Mississippi Rules of Appellate Procedure 46 (b), this office is in receipt of the verified application. This application is deficient as checked below:

- _____ Certification of the \$200 fee payable to the Mississippi Bar was not made.
- _____ The miscellaneous docket fee of \$25.00, as provided in Miss. Code Ann. § 25-7-3, was not paid to the Supreme Court Clerk.
- _____ The name of the Trial Court was omitted.
- XXX The foreign attorney's _____ residence address, was omitted.
- _____ The name and office address of the member or members in good standing of the Mississippi Bar whom the foreign attorney has associated in the particular cause; and
- _____ The verified application of the foreign attorney for appearance pro hac vice shall also be signed by the associated local attorney, certifying the local attorney's agreement to be associated by the foreign attorney in the particular cause.
- _____ A copy of the verified application shall also be served by mail upon all parties who have previously appeared in the cause and shall contain a certification of such service.

Please correct the deficiency within 7 days from the date of notice.


CLERK

cc: Associated Local Counsel

this might be Darren Hankins from Concord CA, who harassed me. I can't state 100%, but the name and city match

Posted on | March 17, 2012 | [3 Comments](#)

re: item under police concerns

X

Inbox

X

Reply

|

robert to me

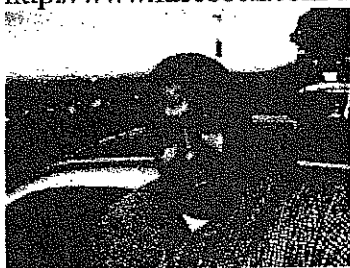
show details 4:17 PM (1 hour ago)

The info below may be for the same person.

darrenGhankins@gmail.com

71.202.156.41, Concord, CA

<http://www.facebook.com/darren.hankins> (Concord, CA)



[Add Friend](#) [Send Message](#)

Darren Hankins

[Share / Save](#) [f](#) [x](#) [e](#) [d](#)

Category: [Uncategorized](#)

Comments

3 Responses to "this might be Darren Hankins from Concord CA, who harassed me. I can't state 100%, but the name and city match"

1. [Rod Riddle](#)

March 17th, 2012 @ 8:21 pm

I can't say 100% that its him either but I can say from the photo that I'm 100% certain that the claim that he is an Obama Fanatic is true.

2. Bim Higgleburg
March 18th, 2012 @ 5:57 am

How do you get that from the photo?

3. Rod Riddle
March 18th, 2012 @ 12:58 pm


Exit Polling, Concord Ca.(Bay Area), life experience, etc, etc.....

Sheriff Joe Cold Posse email address

Posted on | April 3, 2012 | [7 Comments](#)

Billy Stein
Sheriff Joe Cold Posse email address
investigation@mcsoccp.org

Sheriff Joe's cold case investigation is # 602-876-4881.
It allows you to leave a 30 sec. message, but it was already full when I called.

 Share / Save
Category: [Uncategorized](#)

Comments

7 Responses to "Sheriff Joe Cold Posse email address"

1. Thanks

April 3rd, 2012 @ 11:19 am

Appreciate you posting this email address so that I can get it spread around. We'll be sending mass emails with large attachments to this email address. Hope it doesn't get flooded!

2. Ray

April 3rd, 2012 @ 11:52 am

<http://www.linkedin.com/in/johnmarnocha>

Here is his profile, still looking for party.

3. Howard Appel

April 3rd, 2012 @ 12:04 pm

email address doesn't seem to work anymore.

4. Jerry D.

April 3rd, 2012 @ 12:29 pm

OHHH BAD NEWS for the Sherriff:

BREAKING: DOJ Cuts Off Negotiations With Sheriff Joe Arpaio
The Justice Department's Civil Rights Division has cut off negotiations with Maricopa

County Sheriff Joe Arpaio and said his recent actions are driving the U.S. "closer to pursuing judicial remedies." Arpaio had claimed he was cooperating with the probe into alleged civil rights violations back in February.

"We believe that you are wasting time and not negotiating in good faith," Deputy Assistant Attorney General Roy Austin wrote in a letter to Arpaio's lawyer obtained by TPM. "Your tactics have required DOJ to squander valuable time and resources."

Don't think he'll be shwoing up in MS anytime soon.

5. orly taitz
April 3rd, 2012 @ 12:41 pm

actually, it makes it even more important for him to testify and provide all of his findings to judge Coleman

6. The Truth
April 3rd, 2012 @ 2:31 pm

I agree. It is time for the sheriff to spill the beans. He could end up in jail any time now.

7. Larry
April 4th, 2012 @ 1:30 am

The last I read was that "Holder and crew" had made allegations of racism, but Sheriff Joe wanted to see the charges and Holder wouldn't produce anything...so Joe said he would let the legal system decide.

What he needs to do is when they set foot in his county ,he needs to arrest them for something....like slander.

FILED
APR 05 2012

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT
OF HINDS COUNTY, MISSISSIPPI

SUPREME COURT CLERK

DR. ORLY TAITZ, ESQ

FILED

PLAINTIFF

VS.

APR 05 2012

BARBARA DUNN, CIRCUIT CLERK

CIVIL ACTION NO. 251-12-107 CIV

DEMOCRATIC PARTY OF MISSISSIPPI,
SECRETARY OF STATE OF MISSISSIPPI

BY  D.C.

DEFENDANTS

ORDER

This matter having come before the Court by Motion for Admission of Counsel, *Pro Hac Vice*, and Verified Application of Scott J. Teppar, Esq., a licensed attorney and member in good standing of the Bar of the State of California, and the Court, having considered the Motion and Verified Application and the premises therein, finds it to be meritorious and hereby grants it. Accordingly the Court hereby Orders that Scott J. Teppar, Esq. be authorized to appear before the Court *pro hac vice* and participate with co-counsel, namely Samuel L. Begley, Esq. of the Begley Law Firm, PLLC, as counsel for the Defendant, the Mississippi Democratic Party Executive Committee, in all phases of the above captioned proceedings. Mr. Teppar shall provide a copy of this Order to the Clerk of the Supreme Court.

SO ORDERED, this the 2nd day of April, 2012.


R. KENNETH COLEMAN
SPECIAL CIRCUIT JUDGE

Prepared By:
Samuel L. Begley (MSB No. 2315)
BEGLEY LAW FIRM, PLLC
P. O. Box 287
Jackson, MS 39205
(601)969-5545 (Telephone)
(601)969-5547 (Facsimile)

FILED

APR 05 2012

BARBARA DUNN, CIRCUIT CLERK

D.C.

BEGLEY LAW FIRM, PLLC
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Jackson, Mississippi 39205

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(601)969-5545

Facsimile
(601)969-5547

April 5, 2012

Via Hand Delivery

FILED

APR 05 2012

SUPREME COURT CLERK

The Honorable Kathy Gillis
Mississippi Supreme Court Clerk
450 High Street
Jackson, Mississippi 39205
Phone: 601-359-3697

RE: *Dr. Orly Taitz, Esq. v. Democrat (sic) Party of Mississippi, Secretary of State of Mississippi; In the Circuit Court of Hinds County, Mississippi; Civil Action No. 251-12-107 CIV*

Dear Ms. Gillis:

I am enclosing for filing and docketing with your office an Order signed by Special Judge R. Kenneth Coleman which was filed today with the Circuit Court of Hinds County, Mississippi granting the Motion and Verified Application for admission *pro hac vice* of Scott J. Tepper, Esq. to appear in the above captioned civil action.

Thank you for assistance in this matter.

Sincerely,

BEGLEY LAW FIRM, PLLC

By: 

Samuel L. Begley MSB#2315

Enclosures

cc: The Honorable R. Kenneth Coleman, Special Judge (via email)
The Honorable Barbara Dunn, Hinds County Circuit Clerk (via hand delivery)
All Counsel of Record (via email and U.S. Mail)

FILED

APR 05 2012

BARBARA DUNN, CIRCUIT CLERK
BY _____ D.C.

ROBERT KENNETH COLEMAN
CIRCUIT COURT JUDGE,
SENIOR STATUS
P.O. BOX 1995
NEW ALBANY, MS 38652

662-316-2636
cjrkcoleman@hotmail.com

April 2, 2012

Please submit the enclosed Order to the ^{Circuit} clerk for docketing and filing.

Thanks,

RKC

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT
OF HINDS COUNTY, MISSISSIPPI

DR. ORLY TAITZ, ESQ

FILED

PLAINTIFF

VS.

APR 05 2012
BARBARA DUNN, CIRCUIT CLERK
BY _____ D.C.

CIVIL ACTION NO. 251-12-107 CIV

DEMOCRATIC PARTY OF MISSISSIPPI,
SECRETARY OF STATE OF MISSISSIPPI

DEFENDANTS

ORDER

This matter having come before the Court by Motion for Admission of Counsel, *Pro Hac Vice*, and Verified Application of Scott J. Tepper, Esq., a licensed attorney and member in good standing of the Bar of the State of California, and the Court, having considered the Motion and Verified Application and the premises therein, finds it to be meritorious and hereby grants it. Accordingly the Court hereby Orders that Scott J. Tepper, Esq. be authorized to appear before the Court *pro hac vice* and participate with co-counsel, namely Samuel L. Begley, Esq. of the Begley Law Firm, PLLC, as counsel for the Defendant, the Mississippi Democratic Party Executive Committee, in all phases of the above captioned proceedings. Mr. Tepper shall provide a copy of this Order to the Clerk of the Supreme Court.

SO ORDERED, this the 2nd day of April, 2012.


R. KENNETH COLEMAN
SPECIAL CIRCUIT JUDGE

Prepared By:
Samuel L. Begley (MSB No. 2315)
BEGLEY LAW FIRM, PLLC
P. O. Box 287
Jackson, MS 39205
(601)969-5545 (Telephone)
(601)969-5547 (Facsimile)

ROBERT KENNETH COLEMAN
CIRCUIT COURT JUDGE,
SENIOR STATUS
P.O. BOX 1995
NEW ALBANY, MS 38652

662-316-2636
cjrcoleman@hotmail.com

April 2, 2012

Please submit the enclosed Order to the ^{Circuit} clerk for docketing and filing.

Thanks,

RKC

LeGecha McKinley

From: System Administrator
To: sbegley1@bellsouth.net
Sent: Thursday, April 05, 2012 1:16 PM
Subject: Undeliverable: Delivery Status Notification (Failure)

12-107

Your message did not reach some or all of the intended recipients.

Subject:
Sent: 4/5/2012 1:16 PM

The following recipient(s) cannot be reached:

sbegley1@bellsouth.net on 4/5/2012 1:16 PM

There was a SMTP communication problem with the recipient's email server. Please contact your system administrator. The MTS-ID of the original message is: <43D3248BEFD34BC29C936496AE394076@int.co.hinds.ms.us>

<Mail.co.hinds.ms.us #5.5.0 smtp;550 invalid format [f] - see RFC2822>

mailed
orders
from minute
book
730-262
and 730-242

FIRST JUDICIAL DISTRICT

Circuit Clerk's Office

P.O. BOX 327

Jackson, MS 39205

Phone: (601) 968-6628

FILED

APR 19 2012

BARBARA DUNN, CIRCUIT CLERK

BY  D.C.

2C

DR. ORLY TAITZ, ESQ
BRIAN FEDORKA
LAURIE ROTH
LEAH LAX
TOM MacLERAN

V
DEMOCRAT PARTY OF MISSISSIPPI,
SECRETARY OF STATE OF MISSISSIPPI)
BARACK HUSSEIN OBAMA
OBAMA FOR AMERICA)
NANCI PELOSI)
DR. ALVIN ONAKA)
LORETTA FUDDY)
MICHAEL ASTRUE)
JANE DOES, JOHN DOES 1-100)

) FIRST AMENDED COMPLAINT
) PETITION FOR AN EMERGENCY
) INJUNCTION FROM GENERAL
) ELECTION, PERMANENT
) INJUNCTION, DECLARATORY
) RELIEF, TREBLE DAMAGES IN
) RICO
) Hon R Kenneth Coleman
) presiding
) CASE#2012-107
)
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**EMERGENCY MOTION/ PETITION FOR A MISSISSIPPI SUBPOENA
TO SUPPORT CALIFORNIA SUBPOENA**

Plaintiff Orly Taitz is a pro se plaintiff in MS and a licensed attorney in California.

As the defendants Secretary of State of Mississippi and the Democratic Party of Mississippi filed an answer, the parties are in the discovery phase.

Plaintiff, as a licensed California attorney, served two Plaintiff's witnesses with a California subpoena for deposition and production of documents. Witnesses: Producer Bettina Sofia Viviano and director Gigi Gaston are creators of a documentary movie "We Will Not Be Silenced" and they personally gathered a large amount of evidence crucial in this case,

specifically evidence of Barack Obama lacking valid identification papers and an ongoing intimidation of witnesses and whistleblowers, who aware of this information.

As both the Plaintiff, the witnesses and one of the defense attorneys are residents of California, it is the most convenient and cost effective to hold the deposition in California.

As the deposition was scheduled, Plaintiff is asking in this emergency motion for a Mississippi subpoena to support the California subpoena.

Declaration of Orly Taitz is attached.

/s/ Dr. Orly Taitz, ESq

SWORN DECLARATION OF ORLY TAITZ

I Orly, Taitz, am over 18 years old, have personal knowledge of the fact below and will competently testify to following:

1. I am a pro se plaintiff in MS and a licensed attorney in California.
 2. as the defendants Secretary of State of Mississippi and the Democratic Party of Mississippi filed an answer, the parties are in discovery phase.
 3. I, as a licensed California attorney served two Plaintiff's witnesses with a California subpoena for deposition and production of documents to appear in my office in rancho Santa Margarita, Ca on April 20, 2012
 4. Witnesses: Producer Bettina Sofia Viviano and director Gigi Gaston are creators of a documentary movie "We Will Not Be Silenced" and they personally gathered a large amount of evidence crucial in this case, specifically evidence of Barack Obama lacking valid identification papers and an ongoing intimidation of witnesses and whistleblowers, who aware of this information. a lot of information gathered by Ms. Viviano and Ms. Gaston was not included in the movie.
 5. I, as a Plaintiff, have been a victim of similar intimidation and retaliation and the time is of the essence.
 6. As both the Plaintiff, the witnesses and one of the defense attorneys are residents of California, it is the most convenient and cost effective solution to hold the deposition in California.
 7. as the deposition was scheduled for April 20, 2012, Plaintiff is asking in this emergency motion for a Mississippi subpoena to support the California subpoena.
- I declare under penalty of perjury that all of the above is true and correct.

/s/ Orly Taitz

04.15.2012

I, Orly Taitz, attest that I served all parties in the case with above motion petition on 04.15.2012

/s/ Orly Taitz

SUBP-002

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Dr. Orly Taitz, ESQ 29839 Santa Margarita, ste 100, RSM, CA 92688 TELEPHONE NO: 949-683-5411 FAX NO: 949-76607603 E-MAIL ADDRESS: orly.taitz@gmail.com ATTORNEY FOR (Name): Orly Taitz ESQ is appearing in propria persona as a plaintiff		FOR COURT USE ONLY CASE NUMBER: CV 2012-107
NAME OF COURT: Hinds County Circuit Court, MS STREET ADDRESS: 316 S President str MAILING ADDRESS: 316 S President str CITY AND ZIP CODE: Jackson, MS, 39201 BRANCH NAME:		
PLAINTIFF/PETITIONER: Taitz DEFENDANT/RESPONDENT: Secretary of State of Mississippi et al		
CIVIL SUBPOENA (DUCES TECUM) for Personal Appearance and Production of Documents, Electronically Stored Information, and Things at Trial or Hearing and DECLARATION		

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of witness, if known):

Bettina Sofia Viviano

1. **YOU ARE ORDERED TO APPEAR AS A WITNESS** in this action at the date, time, and place shown in the box below **UNLESS** your appearance is excused as indicated in box 3b below or you make an agreement with the person named in item 4 below.

a. Date: **April 20, 2012** Time: **9 am** ☐ Dept.: ☐ Div.: ☐ Room:
 b. Address: **29839 Santa Margarita, ste 300, Rancho Santa Margarita, CA 92688**

2. **IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.**
3. **YOU ARE** (item a or b must be checked):
- a. ☒ Ordered to appear in person and to produce the records described in the declaration on page two or the attached declaration or affidavit. The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1560(b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
- b. ☐ Not required to appear in person if you produce (i) the records described in the declaration on page two or the attached declaration or affidavit and (ii) a completed declaration of custodian of records in compliance with Evidence Code sections 1560, 1561, 1562, and 1271. (1) Place a copy of the records in an envelope (or other wrapper). Enclose the original declaration of the custodian with the records. Seal the envelope. (2) Attach a copy of this subpoena to the envelope or write on the envelope the case name and number, your name, and the date, time, and place from item 1 in the box above. (3) Place this first envelope in an outer envelope, seal it, and mail it to the clerk of the court at the address in item 1. (4) Mail a copy of your declaration to the attorney or party listed at the top of this form.
4. **IF YOU HAVE ANY QUESTIONS ABOUT THE TIME OR DATE YOU ARE TO APPEAR, OR IF YOU WANT TO BE CERTAIN THAT YOUR PRESENCE IS REQUIRED, CONTACT THE FOLLOWING PERSON BEFORE THE DATE ON WHICH YOU ARE TO APPEAR:**
- a. Name of subpoenaing party or attorney: **Dr. Orly Taitz, ESQ** b. Telephone number: **949-683-5411**
5. **Witness Fees:** You are entitled to witness fees and mileage actually traveled both ways, as provided by law, if you request them at the time of service. You may request them before your scheduled appearance from the person named in item 4.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: **04.13.2012**

Dr. Orly Taitz, ESQ

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Dr. Orly Taitz, ESQ

(TITLE)

(Declaration in support of subpoena on reverse)

Page 1 of 3

SUBP-002

PLAINTIFF/PETITIONER: Taitz	CASE NUMBER:
DEFENDANT/RESPONDENT: Secretary of State of Mississippi et al	CV 2012-107

The production of the documents, electronically stored information, or other things sought by the subpoena on page one is supported by (check one):

☐ the attached affidavit or ☒ the following declaration:

DECLARATION IN SUPPORT OF CIVIL SUBPOENA (DUCES TECUM) FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND THINGS AT TRIAL OR HEARING
(Code Civ. Proc., §§ 1985, 1987.5)

1. I, the undersigned, declare I am the ☒ plaintiff ☐ defendant ☐ petitioner ☐ respondent;
☒ attorney for (specify): pro se ☐ other (specify):
in the above-entitled action.

2. The witness has possession or control of the documents, electronically stored information, or other things listed below, and shall produce them at the time and place specified in the Civil Subpoena for Personal Appearance and Production of Records at Trial or Hearing on page one of this form (specify the exact documents or other things to be produce; if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):

any and all records and information in regards to former President Bill Clinton and other Democratic Party officials having knowledge of missing valid identification documents for Mr. Barack Obama.
Any knowledge of any illegal or unethical acts and parties performing such acts in order to cover up Obama's lack of documents. Any knowledge of any intimidation of witnesses and whistleblowers.

☐ Continued on Attachment 2.

3. Good cause exists for the production of the documents, electronically stored information, or other things described in paragraph 2 for the following reasons:

due to reported intimidation, documents might dissappear, witnesses would be intimidated to testify without a subpoena

☐ Continued on Attachment 3.

4. The documents, electronically stored information, or other things described in paragraph 2 are material to the issues involved in this case for the following reasons:

Case at hand revolves around a declaratory relief and injunctive relief sought to prevent Barack Obama from appearing on the ballot due to lack of eligibility and lack of valid identification papers

☐ Continued on Attachment 4.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 04.13.2012

Dr. Orly Taitz, ESQ

(TYPE OR PRINT NAME)

(SIGNATURE OF

☐ SUBPOENING PARTY

☒ ATTORNEY FOR SUBPOENING PARTY)

Request for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five days before the date on which you are to appear. Contact the clerk's office or go to www.courts.ca.gov/forms for Request for Accommodations by Persons With Disabilities and Response (form MC-410). (Civil Code, § 54.8.)



(Proof of service on page 3)

Code of Civil Procedure,
§. 1985 et seq.
WWW.COURTS.CA.GOV

SUBP-002

PLAINTIFF/PETITIONER: Taitz	CASE NUMBER: CV 2012-107
DEFENDANT/RESPONDENT: Secretary of State of Mississippi et al	

The production of the documents, electronically stored information, or other things sought by the subpoena on page one is supported by (check one):

☐ the attached affidavit or ☒ the following declaration:

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(Code Civ. Proc., §§ 1985, 1987.5)

1. I, the undersigned, declare I am the ☒ plaintiff ☐ defendant ☐ petitioner ☐ respondent
☒ attorney for (specify): pro se ☐ other (specify):
in the above-entitled action.

2. The witness has possession or control of the documents, electronically stored information, or other things listed below, and shall produce them at the time and place specified in the Civil Subpoena for Personal Appearance and Production of Records at Trial or Hearing on page one of this form (specify the exact documents or other things to be produced; if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):

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☐ Continued on Attachment 4.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 04.13.2012

Dr. Orly Taitz, ESQ

(TYPE OR PRINT NAME)

(SIGNATURE OF

☒ SUBPOENAING PARTY

☒ ATTORNEY FOR SUBPOENAING PARTY)

Request for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five days before the date on which you are to appear. Contact the clerk's office or go to www.courts.ca.gov/forms for Request for Accommodations by Persons With Disabilities and Response (form MC-410). (Civ. Code, § 54.8.)



(Proof of service on page 3)

Notice of deposition
Inboxx

Orly Taitz Apr 15 (2 days ago)

Dear Judge Coleman and counsel Notice of Deposition Due to the fact that Defe...

Orly Taitz
Apr 15 (2 days ago)

to Robert, scottjtepper, me, Fran, Harold, gilbert, nagamine, Justin, Laurie, leahlax1234, sbegley1, Tom

Dear Judge Coleman and counsel
Notice of Deposition

Due to the fact that Defendants filed today their answer to the complaint, I am starting depositions. This is a notice of deposition of Plaintiff's witnesses Hollywood producer Bettina Viviano and director Gigi Gaston, who were the producer and the director of the BBC documentary "We Will Not Be Silent" devoted to elections fraud and intimidation during the 2008 election. Deposition will also address Ms. Viviano's recent interview, where she alleged that the 2008 murder of Bill Gwatney, Chairman of Arkansas Democratic party was associated with his knowledge of Mr. Obama's lack of eligibility and a form of intimidation of former President Bill Clinton in order to prevent him from talking on the issue.

The article is in the attachment.

Respectfully,

/s/ Dr. Orly Taitz, ESQ

<http://thedailybell.com/3775/VIDEO-Hollywood-Producer-Bettina-Viviano-Claims-Obama-Ineligible>

VIDEO: Hollywood Producer Bettina Viviano Startling Claim: Obama Ineligible

Monday, April 09, 2012 – by Staff Report

Clintons Knew Obama Ineligible & DNC Primary Fraud - Claims Hollywood Producer ... Hollywood Producer Bettina Viviano says that the Clintons were the original birthers and people were silenced and threatened. Also talks about voter fraud in the Democrat Primaries. Watch Sheriff Joe Arpaio's Press Conference before passing judgment! Then if you still think its crap, knock yourself out with the comments. – YouTube

Dominant Social Theme: The crackpot truthers ought to go away. They're just confusing the issue.

Free-Market Analysis: Now someone else has come out and claimed that US President Barack Obama is not eligible to hold the country's highest office because he was not a "natural born citizen."

Hollywood producer Bettina Viviano (see excerpt above) claims that both Bill and Hillary Clinton were aware that Obama was not eligible for the country's highest office,

but that murder and intimidation were used to shut down any potential accusations. It is a startling accusation but she is making it publicly.

Viviano, who started her own film production company in 1990 after serving as vice president of production for Steven Spielberg's Amblin Entertainment, told Jerome Corsi of the alternative media's World Net Daily that it was "common knowledge" the Clinton's knew about Obama's ineligibility.

Viviano filmed a documentary of the Hillary Clinton campaign called "We Will Not Be Silenced" about voter fraud intended to ensure that Clinton lost the nomination to Obama. Eventually, she did.

But Viviano claims that voter fraud was rife throughout the Clinton/Obama primary contests. She even claims that Bill Gwatney, State Chair of the Democratic Party of Arkansas and a former Arkansas Senator, was murdered as a warning to Bill Clinton to keep quiet.

She adds it was well known throughout Hillary's campaign that sooner or later the accusations would be aired, probably by Bill Clinton. However they never were – perhaps because Clinton perceived Gwatney's death as a personal threat.

On August 13, 2008, Gwatney was shot by Timothy Dale Johnson at Democratic Party headquarters in Little Rock, Arkansas. Gwatney was taken to a hospital, but died at 3:59 pm CDT. The gunman was captured but no motive was ever discovered for the shooting. Recently, the allegations have been in the news once again. On March 31, Arizona Sheriff Joe Arpaio presented preliminary findings claiming that Barack Obama's birth certificate – recently released by the White House – was a forgery. He later claimed that Obama's draft registration was a forgery as well.

And at a recent town hall meeting US Rep. Vicky Hartzler (R-MO) stated that President Obama's birth certificate might not be legitimate. Rep. Hartzler said is quoted as saying: "I don't know, I haven't seen it ... But I don't understand why he didn't show that right away."

Viviano presents no direct evidence for her views, but she is emphatic and seems sincere. Watch the Viviano/Corsi interview [here](#).

(Video from pmpowell001's YouTube user channel.)

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Dr Orly TaitzESQ29839 Santa Margarita pkwy, ste 100Rancho Santa Margarita, CA
92688ph 949-683-5411 fax949-766-7603 orlytaitzesq.com

Subpoena Bettina Viviano, Gigi Gaston.pdf
1014K View Download

emergency petition for a MS subpoena to support Ca subpoena
Inboxx

Orly Taitz Apr 15 (1 day ago)

Dear Judge Coleman and counsel, please find attached an emergency motion for ...

Orly Taitz

Apr 15 (1 day ago)

to me, Fran, Harold, gilbert, nagamine, Justin, Laurie, leahlax1234, Robert, Samuel,
Scott, Tom

Dear Judge Coleman and counsel, please find attached an emergency motion for a MS
subpoena to support a CA deposition subpoena

Respectfully

/s/ Orly Taitz

--

Dr Orly Taitz ESQ 29839 Santa Margarita pkwy, ste 100 Rancho Santa Margarita, CA
92688 ph 949-683-5411 fax 949-766-7603 orlytaitzesq.com

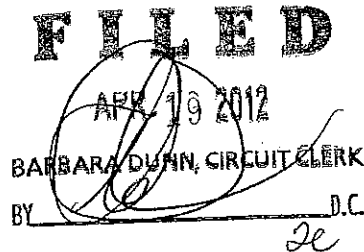
2 attachments — Download all attachments

MS emergency petition for subpoena for Viviano, Gaston.docx

13K View Download

Subpoena Bettina Viviano, Gigi Gaston.pdf

1014K View Download



Opposition to motion in limine

Motion in Limine by the plaintiff

Motion for subpoena duces tecum for appearance at the hearing and production of documents by party of interest, candidate on the ballot Barack Hussein Obama, attorney General of MS Jim Hood, defenders –members of the Executive committee of the Democratic party of Mississippi, attorney Samuel Begley, Director of the Social Security Administration for the Southern District of the State of Mississippi, director of Health of the State of Hawaii Loretta Fuddy.

Latest motion by the defendant, Democratic Party of the state of Mississippi reads as a sign of desperation.

Information requested is impertinent and immaterial for the legal action at hand Defendant, Democratic Party of Mississippi demands to put the plaintiff on the stand, seeking to get information in regards to her donors and believing that someone is helping the plaintiff or incited her to bringing the action at hand.

The motion in itself is a sign of an unprecedented level of corruption, total lack of integrity, human decency and any values by the defendants and their attorney, Mr. Samuel Begley.

Plaintiff presented defendants with affidavits and videotaped sworn testimony of a senior deportation officer, licensed detective and other experts and videotaped press conference of the sheriff of Maricopa county, Arizona, showing that Barack Hussein Obama posted on line a computer generated forgery, claiming it to be a true and correct copy of his birth certificate. Additionally plaintiff provided evidence of Obama using a fraudulently obtained Social Security number.

Any decent human being would realize that it is the number one priority of national importance to remove from the White House and criminally prosecute an individual usurping the U.S. Presidency.

Apparently, members of the executive committee of the Democratic Party of Mississippi and their attorney, Samuel Begley, do not have a drop of decency, as they believe that there must be somebody behind the Plaintiff, somebody supporting her and telling her to file this action.

First of all, Taitz is acting as a decent human being (a concept which is obviously foreign to the Defendant and Mr. Begley). Second of all, as a licensed attorney in California she took an oath of office to uphold the rule of law and constitution. She came across evidence of the biggest crime ever committed in this nation and she is doing everything in her powers to end it. The motion in limine is totally frivolous. Even if one were to assume *arguendo* that there is somebody assisting her with donations, it still does not change the essence of the case, it does not change the material facts of the case.

Will placing Taitz on the stand change any facts about Obama? Will getting a name of a donor make Obama an honest person ? No

Will getting a name of a donor somehow make Obama's forged birth certificate valid? No.

Will getting a name of a donor somehow make Obama's stolen Social Security number valid? No.

So, the whole motion is simply frivolous and should be denied and defendants and their attorney should be severely sanctioned for bringing such a ridiculous motion, which is nothing but an insult to one's intelligence.

So, why was this motion filed?

The answer is simple. Defendants cannot negate the facts of the case. They did not provide any valid documents for Obama, as those simply do not exist. So, the defendant is simply trying to kill the messenger, as they do not like the message.

Defendant's Allegations of Obama's legitimacy and allegations of Obama's valid birth certificate are baseless and fraudulent

Defendants are making an assertion: "Barack Obama provided his birth certificate".

This assertion is totally baseless. Obama never provided either an original or a certified copy of his birth certificate to any judge or jury or Secretary of State. Taitz provided the defendants with affidavits showing Obama committing fraud and using a computer generated forgery. Defendants are intentionally and maliciously attempting to defraud the court. They are engaged in misprision of felonies and are aiding and abetting felonies. This motion in itself is yet another reason, why the Plaintiff should be given a leave of court to file and amended complaint with additional RICO cause of action against the defendants, including an additional predicate offense of Misprision of felonies under 18USC Chapter 1, §4 .

Similar legal challenge was brought to court by a Mississippi judge

In 2008 Honorable Judge James Bell and three other licensed attorneys Thomas Smith, James Hochberg and Philip Borden brought forward a similar case in the Southern district of Mississippi and in the District of Hawaii Thomas v Hosemann 2:08-cv-00241-KS-MID and Thomas v Hosemann 1 : 08MC-00280 DHA Dec 18, 2008. This case was brought on behalf of over 30 presidential electors, who were concerned about Obama's birth certificate being forged. Similarly, the Plaintiffs represented by a retired Mississippi judge and three other attorneys were seeking Declaratory relief and expedited discovery on the issue of Obama's eligibility. Plaintiff's attorney, retired judge James Bell served in county, circuit and chancery courts in MS (Exhibit 1) was the secretary of the advisory committee to the Supreme court of Mississippi, and he is listed among outstanding lawyers of America and in the Mississippi registry of pre-eminent lawyers. Defendants' attorney, Mr. Samuel Begley should be so lucky to have credentials like these. If a retired Mississippi judge and a member of the Mississippi bar with such outstanding credentials believed that a case like this is warranted, than it is most likely that this case has merit and definitely not frivolous. In 2008 there were suspicions of forgery, an ancillary action was filed in the district of Hawaii, however the health department of

Hawaii refused to cooperate and the case was withdrawn due to lack of sufficient evidence. In 2011, when Taitz was about to argue her case before the 9th Circuit, Obama tried to preempt a negative ruling and posted on line what he claimed to be a copy of his original birth certificate. Taitz received affidavits from multiple experts: Retired Senoir Deportation officer John Sampson, Detective Susan Daniels, Information Technology Expert Felicito Papa, Scanning expert John Vogt and recently opinion of sheriff Arpaio, all of whom concur that Obama is using a forgery, which he posted on line, claiming it to be a valid copy of his birth certificate. So a this time there is much more evidence showing fraud. So, if this case was not frivolous in 2008 with very limited evidence, it is clearly not frivolous today with extensive evidence. Motion in limine is nothing but a desperate attempt to intimidate and harass an attorney bringing explosive evidence.

Similar motion to dismiss was denied in the state of Georgia.

From 2008 a number of legal actions were brought against Obama, however these actions were dismissed as judges were reluctant to undo the results of a national election and were concerned of a backlash and repeat of Bush v Gore.

Currently the situation is different, as Obama id being sued not as a President, but as a candidate. There was only one such action filed. This action was filed in the state of Georgia Farrar et al v Obama et al. Similarly, defense was seeking to dismiss such action and the motion to dismiss was denied. (Exhibit 2 Denial of motion to dismiss). Taitz represented the Paintiffs in that action were represented by Taitz. Moreover, Taitz issued several subpoenas, among them a subpoena for Obama to appear and provide his identification papers. Obama filed an opposition and yet again the presiding judge ruled in favor of the plaintiffs represented by Taitz (Exhibit 3 Opposition to motion to quash subpoenas in Farrar v Obama , Exhibit 4 Order denying motion to quash subpoenas) This precedent shows that indeed legal action at hand is being based on fact and law, legitimate and not frivolous. Not only Motion in limine should be denied, but motions to dismiss should be denied as well.

Motion to Subpoena documents

As state previously, in the prior action, in the state of Georgia, in the administrative court subpoenas to produce identification documents were upheld. It appears in Mississippi a hearing is needed to obtain subpoenas. In the interest of judicial economy Taitz moves this court to issue following subpoenas or to allow Taitz to issue subpoenas to be submitted for the signature of this court or hear at the April 16 motion hearing a request for issuance of the following subpoenas:

1. Subpoena to be issued to the defendant Democratic Party of Mississippi to produce any and all valid original identification papers or certified copies of the valid identification papears, including long form birth certificate of Barack Obama, based on which they are asserting that Barack Obama was born in Hawaii.
2. For the custodian of records in the department of Health and Human services in the State of Mississippi to produce a SS-5 appliction



James Bell graduated with honors and distinction from the University of Mississippi in 1975, and received his JD in 1977. He formerly served as a trial judge in the County, Circuit and Chancery Courts of Mississippi, and received a 96.5% approval rating from Hinds County Bar members in the 1986 judicial preference poll. His practice includes general litigation, business solutions, personal injury and serves as an arbitrator and mediator. Publications include Habeas Corpus: The "Great Writ" in Mississippi State Courts, 58 Mississippi Law Journal 25 (1989); Circuit Judges Bench Book, Mississippi Judicial College, (1991). He has served as the secretary of the Mississippi Supreme Court Advisory Committee on Rules since 1989. He is listed in Outstanding Lawyers of America and in the Bar Registry of Pre-Eminent Lawyers. In 2004, he was selected to be a "Fellow" of the Mississippi Bar Foundation. In 2010, he was elected by his fellow former judges as the Chair of the Conference of Senior and Special Judges.

HONORS:

2004 Designated as a Fellow of the Mississippi Bar Foundation

2004 Listed in Best's Directory of Lawyers

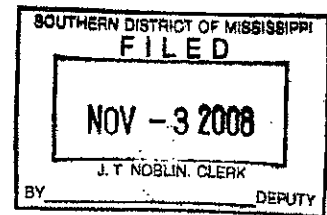
2003-present Listed in Outstanding Lawyers of America

1998-present Listed in Bar Register of Preeminent Lawyers

1991-present AV rating by Martindale-Hubbell

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI



Daniel Scott Thomas, Elector for the State of California, who is nominated to vote in the Electoral College and is pledged to vote for Candidate Alan Keyes for President of the United States; Carl Bibeau, Teresa Bibeau, Ronald M. Hack, Stefany M. Hack, Jason Paulos, Gregory Poulos, Karen Poulos, Keith Poulos, Patricia J. Donahue, Michelle Tennison, Dr. Alan Keyes, Electors of the State of Florida, all of whom are nominated to vote in the Electoral College and are pledged to vote for Candidate Alan Keyes for President of the United States; Gerald L. Coffee, Elector for the State of Hawaii, who is nominated to vote in the Electoral College and is pledged to vote for Candidate John McCain for President of the United States; Geketa Holman, Elector for the Commonwealth of Kentucky, who is nominated to vote in the Electoral College and is pledged to vote for Candidate Alan Keyes for President of the United States; Joseph Mantegna, Arthur H. Hady, Brian Paul Weese, John H. Bane, Tim Phares, Bob Bailey and Steven B. Schulin, Electors of the State of Maryland, all of whom are nominated to vote in the Electoral College and are pledged to vote for Candidate Alan Keyes for President of the United States; Patrick Flynn, Elector for the State of Michigan, who is nominated to vote in the Electoral College and is pledged to vote for Candidate Alan Keyes for President of the United States; Tim Delrie, Leslie Riley and Vince Thornton, Electors of the State of Mississippi, all of whom are nominated to vote in the Electoral College and are pledged to vote for Candidate Chuck Baldwin for President of the United States; Christiane Schmenk and Joyce Houck, Electors of the State of Ohio, all of whom are nominated to vote in the Electoral College and are pledged to vote for Candidate John McCain for President of the United States; Virginia Chrisco, Elector for the State of Oklahoma, who is nominated to vote in the Electoral College and is pledged to vote for Candidate John McCain for President of the United States; Marvin Sprouse, Jr., Elector for the State of Texas, who is nominated to vote in the Electoral College and is pledged to vote for Candidate Alan Keyes for President of the United States; John Doe(s) and Jane Does(s), Electors of the various states nominated to vote in the Electoral College for Candidates for President and Vice-President of the United States, John Doe(s) and Jane Doe(s), Congressmen and Congresswomen in the United States House of Representatives,

PLAINTIFF(s),

v.

Delbert Hoseman, in his official capacity as Secretary of State for the State of Mississippi,

DEFENDANT(s).

**COMPLAINT FOR
DECLARATORY
JUDGMENT &
EXPEDITED
DISCOVERY**

Civil Action No. 2:08CV2415-MTP

**COMPLAINT FOR DECLARATORY JUDGMENT &
EXPEDITED DISCOVERY**

Come now the PLAINTIFF(s), electors duly nominated pursuant to the laws of their various states as follows: Daniel Scott Thomas, Elector for the State of California, who is nominated to vote in the Electoral College and is pledged to vote for Candidate Alan Keyes for President of the United States; Carl Bibeau, Teresa Bibeau, Ronald M. Hack, Stefany M. Hack, Jason Paulos, Gregory Poulos, Karen Poulos, Keith Poulos, Patricia J. Donahue, Michelle Tennison, Dr. Alan Keyes, Electors of the State of Florida, all of whom are nominated to vote in the Electoral College and are pledged to vote for Candidate Alan Keyes for President of the United States; Gerald L. Coffee, Elector for the State of Hawaii, who is nominated to vote in the Electoral College and is pledged to vote for Candidate John McCain for President of the United States; Geketa Holman, Elector for the Commonwealth of Kentucky, who is nominated to vote in the Electoral College and is pledged to vote for Candidate Alan Keyes for President of the United States; Joseph Mantegna, Arthur H. Hady, Brian Paul Weese, John H. Bane, Tim Phares, Bob Bailey and Steven B. Schulin, Electors of the State of Maryland, all of whom are nominated to vote in the Electoral College and are pledged to vote for Candidate Alan Keyes for President of the United States; Patrick Flynn, Elector for the State of Michigan, who is nominated to vote in the Electoral College and is pledged to vote for Candidate Alan Keyes for President of the United States; Tim Delrie, Leslie Riley and Vince Thornton, Electors of the State of Mississippi, all of whom are nominated to vote in the Electoral College and are pledged to vote for Candidate Chuck Baldwin for President of the United States; Christiane Schmenk and Joyce Houck, Electors of the State of Ohio, all of whom are nominated to vote in the Electoral College and are pledged to vote for Candidate John McCain for President of the United States; Virginia Chrisco,

Elector for the State of Oklahoma, who is nominated to vote in the Electoral College and is pledged to vote for Candidate John McCain for President of the United States; Marvin Sprouse, Jr., Elector for the State of Texas, who is nominated to vote in the Electoral College and is pledged to vote for Candidate Alan Keyes for President of the United States; John Doe(s) and Jane Does(s), Electors of the various states nominated to vote in the Electoral College for Candidates for President and Vice-President of the United States, John Doe(s) and Jane Doe(s), Congressmen and Congresswomen in the United States House of Representatives, John Doe(s) and Jane Does(s), Electors of the various states nominated to vote in the Electoral College for Candidates for President and Vice-President of the United States; and John Doe(s) and Jane Doe(s) elected members of the U.S. Congress likely to receive the votes of the electors for review, to file this Complaint seeking:

FIRST, a Declaratory Judgment that the qualifications of all candidates for the offices of President and Vice-President of the United States as "Natural Born" citizens under Article II of the Constitution of the United States determined and verified by the Secretary of State, or other officer to whom is delegated the responsibility for the integrity of the ballot in that state is an essential element in the right to vote of every America voter, the electors, and the members of Congress who must count the electoral votes, and

SECOND, an Order for expedited discovery in the form attached hereto requiring and enabling the DEFENDANT Secretary of State to obtain evidence of the qualifications of every candidate for President and Vice-President as "natural born" citizens in compliance with Article II of the Constitution of the United States, and communicate such findings to the Secretaries of State in all other states and in support thereof would state as follows:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331. This Court may exercise ancillary jurisdiction under 28 U.S. C. § 1367(a) to hear claims under the Constitution and laws of Mississippi. This Court has jurisdiction to grant both declaratory and injunctive relief under 28 U.S.C. §§ 2201 and 2202.

2. Venue is proper in this Court under 28 U.S.C. § 1391(b)(1) because Defendant Hoseman is situated within this judicial district.

PLAINTIFFS

3. That pursuant to Article II, Section 1 of the United States Constitution and state law, PLAINTIFF electors appear on the November 4, 2008, state ballots as indicated by their names in the attached list as a candidate for the office of Elector pledged to cast a ballot for President and Vice President of the United States of America, as provided in the Twelfth Amendment to the U.S. Constitution and their respective state laws.

DEFENDANT

4. Delbert Hoseman is the Secretary of State of Mississippi ("Secretary of State") and the chief election officer for the State. Miss Code Ann. § 23-15-211.1 and is sued in his official capacity.

5. That pursuant to Article II, Section 1 of the United States Constitution and state law, PLAINTIFF electors appear on the November 4, 2008, state ballots as indicated by their names in the attached list as a candidate for the office of Elector pledged to cast a ballot for President and Vice President of the United States of America, as provided in the Twelfth Amendment to the U.S. Constitution and their respective state laws.

6. That as candidate for the office of Elector entitled to vote to elect the President and Vice President of the United States, PLAINTIFF(s) have a constitutionally mandated duty to choose only such persons to fill such offices as they, in their discretion and according to law, ought to be entrusted with the powers and duties of such offices.

7. That, in order to discharge such duty, PLAINTIFF(s) must have access to all relevant information to ensure that the offices shall be filled only by such persons as are endowed with the requisite qualifications, including whether the candidates for President and Vice President meet the constitutional qualifications for office. The plaintiffs would suffer an injury in fact if this Court denied their right to bring this Motion for Declaratory Judgment. Those injuries would include, but not be limited to, their failure to perform their constitutionally mandated duties and the consequences associated therewith, the potential for civil fines and being required to defend themselves against causes of action such as a writ of mandamus, as well as their removal from office for a failure to comply with their individual state law. Plaintiffs come to this Court with a genuine present, substantial interest that would insure that this Court has the benefit of truly adverse parties. Without this Court's intervention, plaintiffs would have no opportunity to redress these wrongs.

8. That, among the constitutional qualifications for the office of President of the United States pursuant to Article II of the Constitution of the United States, a person shall be a natural born citizen of the United States.

9. That 3 U.S.C. Section 8 provides that: "The electors shall vote for President and Vice President, respectively, in the manner directed by the Constitution." This federal statute confers upon each elector an affirmative duty to discover whether the candidate for president for which

the elector is seeking election is a natural born citizen. Otherwise, the elector would not know if his vote was being cast in the "manner directed by the Constitution."

10. That given this constitutionally mandated duty, PLAINTIFF(s) have standing to bring this Complaint before this Court.

11. That a growing number of questions have arisen in litigation in at least ten (10) states contesting whether Senator John McCain and Senator Barack Obama are natural born citizens and, therefore, constitutionally eligible to be entrusted with the office of President of the United States. In the litigation against Senator Obama, allegations were made that his admitted dual citizenship in Kenya and Indonesia, and lack of evidence that he renounced the same, caused a loss of his U.S. Citizenship as a matter of law. Moreover, evidence released by the Obama campaign purporting to be a "Certification of Live Birth" on its face appears to be manufactured and unauthentic. See Exhibit A. This evidence was released to FactCheck.org, an Annenberg related agency which seeks to determine the veracity of certain claims made in public forums. See Exhibit B. One of the many problems with this evidence is that the border design differs from the border designs of other Certifications of Live Birth printed during the same time period. See Exhibit C. All these questions about both candidates are still unresolved. In the course of those lawsuits, some of which have been dismissed, it was determined that there exists no designated official in the federal government or the government of the states directly charged with the responsibility of determining whether any Presidential candidate meets the qualifications of Article II of the Constitution of the United States. In most states that responsibility is vested with the political parties, all of which have a conflict of interest in making any sort of such

determination, and none of which have been forthcoming with information or evidence verifying any candidate's compliance.

12. A press release was issued on October 31, 2008 by the Hawaii Department of Health by its Director, Dr. Chiome Fukino. Dr. Fukino said that she had "personally seen and verified that the Hawaii State Department of Health has Sen. Obama's original birth certificate on record in accordance with state policies and procedures." That statement failed to resolve any of the questions being raised by litigation and press accounts. Being "on record" could mean either that its contents are in the computer database of the department or an actual "vault" original. If the latter, those are the words used to describe what is there.

Further, the report does not say whether the birth certificate in the "record" is a Certificate of Live Birth or a Certificate of Hawaiian Birth. In Hawaii, a Certificate of Live Birth resulting from hospital documentation, including a signature of an attending physician, is different from a Certificate of Hawaiian Birth. For births prior to 1972, a Certificate of Hawaiian Birth is the result of testimony of one witness and is not generated by a hospital. Such a Certificate could be obtained up to 1 year from the date of the child's birth. For that reason, its value as prima facie evidence is limited and easily overcome if any of the allegations of substantial evidence of birth outside Hawaii can be obtained and verified with a Court Order.

13. Despite an aggressive public dialogue about the qualifications of the Presidential candidates of the two major parties, there is no information whatsoever being disseminated concerning the qualifications of Presidential and Vice-Presidential candidates of the other parties.

14. That an unprecedented looming constitutional crisis awaits if a President elected by the popular vote and the electoral vote does not constitutionally qualify to serve in that capacity.

Given the current international turbulence, the potential results of this constitutional crisis would threaten the national security of the United States. The enormity of this grave risk is the reason for an urgent request to this Court to respond quickly to avert crisis.

15. That in order to discharge their constitutional and legal duties as Electors to ascertain whether any and all candidates for President and Vice-President possess the requisite constitutional qualification of natural born citizenship, PLAINTIFF(s) jointly seek the access of DEFENDANT to the birth certificates of every candidate for President or Vice-President and any other evidence required to determine their qualifications as "natural born" citizens.

16. The applicable section of U.S. Code titled "Presidential Elections and Vacancies", 3 U.S.C. 15, directs Congress in session on January 9, 2009 to open, count and record the electoral votes, then present the results to the President of the Senate, who shall then "announce the state of the vote." Ibid. The statute provides a mechanism for objections then to be registered and resolved that include the qualifications of those elected to serve in the office of President:

The Twentieth Amendment further provides, "if the President elect shall have failed to qualify, then the Vice President elect shall act as President until a President shall have qualified; and the Congress may by law provide for the case wherein neither a President elect nor a Vice President elect shall have qualified, declaring who shall then act as President, or the manner in which one who is to act shall be elected, and such person shall act accordingly until a President or Vice President shall have qualified.

17. Although Congress has the power to subpoena and/or duty to demand proof of qualifications for the office, a failure to qualify discovered at that time after the electoral vote could cause a widespread crisis of confidence not only in the United States but in other nations

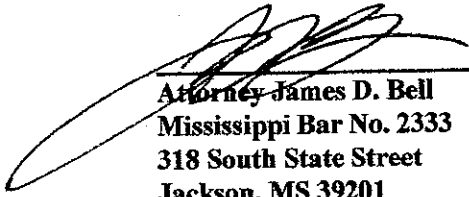
already shaken with concern about the stability of our already weakened economy as well as our democratic system of government. PLAINTIFF members of Congress would be forced to make a determination with information denied from American voters and electors. Such denial and resulting constitutional crisis is avoided by completing the expedited discovery respectfully requested in the attached Order. In addition, this matter must be resolved now before the defense of laches would become applicable.

18. The Order attached empowers and authorizes the Defendant Secretary of State to work in cooperation with other Secretaries of State in other states and/or with the National Association of Secretaries of State, to formulate procedures to aid in making a determination of the qualifications of candidates, while maintaining the confidential nature of information that may be obtained through this expedited discovery that is not essential to the determination of a candidate's qualifications.

Wherefore, PLAINTIFFS respectfully request the attached Order For Expedited Discovery commanding DEFENDANT to produce for DEFENDANT's own inspection and review, under seal, certified copies of the birth certificates, and any further evidence necessary to establish the status as "natural born" citizens of every candidate for President and Vice-President of the United States and furnish its conclusions concerning same to the public and every other state no later than December 9, which date by law all states must conclude all contests or controversies concerning the selection of electors.

Date: November 3, 2008

Respectfully submitted,



Attorney James D. Bell
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318 South State Street
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Hampton, VA 23666
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Attorney James Hochberg*
HI Bar No. 3686
745 Fort St., Suite 1450
Honolulu, HI 96183
808-534-1514

*Applications *pro hac vice* will be submitted.

OFFICE OF STATE ADMINISTRATIVE HEARINGS
STATE OF GEORGIA

DAVID FARRAR, LEAH LAX, CODY
JUDY, THOMAS MALAREN, LAURIE
ROTH,

Plaintiffs,

v.

BARACK OBAMA,

Defendant.

Docket Number: OSAH-SECSTATE-CE-
1215136-60-MALIHI

Counsel for Plaintiffs: Orly Taitz

Counsel for Defendant: Michael Jablonski

DAVID P. WELDEN,

Plaintiff,

v.

BARACK OBAMA,

Defendant.

Docket Number: OSAH-SECSTATE-CE-
1215137-60-MALIHI

Counsel for Plaintiff: Van R. Irion

Counsel for Defendant: Michael Jablonski

CARL SWENSSON,

Plaintiff,

v.

BARACK OBAMA,

Defendant.

Docket Number: OSAH-SECSTATE-CE-
1216218-60-MALIHI

Counsel for Plaintiff: J. Mark Hatfield

Counsel for Defendant: Michael Jablonski

KEVIN RICHARD POWELL,

Plaintiff,

v.

BARACK OBAMA,

Defendant.

Docket Number: OSAH-SECSTATE-CE-
1216823-60-MALIHI

Counsel for Plaintiff: J. Mark Hatfield

Counsel for Defendant: Michael Jablonski

ORDER ON MOTION TO DISMISS

On December 15, 2011, Defendant, President Barack Obama, moved for dismissal of Plaintiffs' challenge to his qualifications for office. The Court has jurisdiction to hear this contested case pursuant to Chapter 13 of Title 50, the "Georgia Administrative Procedure Act."

For the reasons indicated below, Defendant's Motion to Dismiss is **DENIED**.¹

I. Discussion

1.

The Georgia Election Code (the "Code") mandates that "[e]very candidate for federal and state office who is certified by the state executive committee of a political party or who files a notice of candidacy shall meet the constitutional and statutory qualifications for holding the office being sought." O.C.G.A. § 21-2-5(a).

2.

Both the Secretary of State and the electors of Georgia are granted the authority under the Code to challenge the qualifications of a candidate. The challenge procedures are defined in Code Section 21-2-5(b), which authorizes any elector who is eligible to vote for a candidate to challenge the qualifications of the candidate by filing a written complaint with the Secretary of State within two weeks after the deadline for qualifying. O.C.G.A. § 21-2-5(b).

3.

The Georgia law governing presidential preference primaries mandates that "[o]n a date set by the Secretary of State . . . the state executive committee of each party which is to conduct a presidential preference primary shall submit to the Secretary of State a list of the names of the candidates of such party to appear on the presidential preference primary ballot." O.C.G.A. § 21-2-193. On October 6, 2011, Secretary Kemp issued a notice to the chairman of each political

¹ Because Defendant's Motion to Dismiss is denied, in the interest of efficiency, the Court finds it unnecessary to wait for the Plaintiffs' responses before denying the motion.

party to notify them that the deadline for submitting the list of candidate names for the 2012 presidential preference primary was November 15, 2011. On November 1, 2011, the Executive Committee of the Democratic Party submitted President Barack Obama's name as the sole candidate for the Democratic Party. To be timely, complaints challenging a presidential candidate's qualifications in the presidential preference primary had to be filed no later than November 29, 2011. Plaintiffs, as electors eligible to vote for Defendant, timely filed challenges with the Secretary of State before the deadline of November 29, 2011.

4.

In the instant motion, Defendant contends that Georgia law does not give Plaintiffs authority to challenge a political party's nominee for president in a presidential preference primary because Code Section 21-2-5 does not apply to the presidential preference primary.

5.

Statutory provisions must be read as they are written, and this Court finds that the cases cited by Defendant are not controlling. When the Court construes a constitutional or statutory provision, the "first step . . . is to examine the plain statutory language." Morrison v. Claborn, 294 Ga. App. 508, 512 (2008). "Where the language of a statute is plain and unambiguous, judicial construction is not only unnecessary but forbidden. In the absence of words of limitation, words in a statute should be given their ordinary and everyday meaning." Six Flags Over Ga. v. Kull, 276 Ga. 210, 211 (2003) (citations and quotation marks omitted). Because there is no other "natural and reasonable construction" of the statutory language, this Court is "not authorized either to read into or to read out that which would add to or change its meaning." Blum v. Schrader, 281 Ga. 238, 240 (2006) (quotation marks omitted).

6.

Code Section 21-2-5(a) states that "*every candidate for federal and state office*" must meet the qualifications for holding that particular office, and this Court has seen no case law limiting this provision, nor found any language that contains an exception for the office of president or stating that the provision does not apply to the presidential preference primary. O.C.G.A. 21-2-5(a) (emphasis added). Although the word "candidate" is not explicitly defined in the Code, Section 21-2-193 states that the political party for the presidential preference

Page 3 of 4

primary "shall submit to the Secretary of State a list of the names of the *candidates* of such party to appear on the presidential preference primary ballot." O.C.G.A. 21-2-193 (emphasis added). Accordingly, this Court finds that Defendant is a candidate for federal office.

7.

Code Sections 21-2-190 to 21-2-200 set out the procedures of the presidential preference primary and also provide no exception to the Section 21-2-5 qualification requirement. This Court finds no basis under Georgia law why the qualification requirements in Section 21-2-5 would not apply to a candidate for the office of the president in the presidential preference primary.

8.

Accordingly, this Court finds that Defendant is a candidate for federal office who has been certified by the state executive committee of a political party, and therefore must, under Code Section 21-2-5, meet the constitutional and statutory qualifications for holding the office being sought.

II. Decision

Based on the foregoing, the motion to dismiss is **DENIED**.

SO ORDERED, this the 3rd day of January, 2012.


MICHAEL M. MALIHI, Judge

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Attorney For Petitioners

OFFICE OF STATE ADMINISTRATIVE HEARINGS
STATE OF GEORGIA

DAVID FARRAR,
LEAH LAX,
CODY ROBERT JUDY,
THOMAS MacLAREN
LAURIE ROTH

Plaintiffs,

v.

BARACK OBAMA

Defendant.

DOCKET #: OSAH-SECSTATE-
CE-1215136-60-MALIHI

OPPOSITION TO MOTION TO QUASH
SUBPOENAS

Plaintiffs herein oppose motion to quash subpoenas as one with no merit and utterly frivolous. Motion is loaded with irrelevant material, represents mostly an attack on the Plaintiffs' counsel and an attempt to prejudice the court against

Plaintiffs counsel. Motion is vague and does not present any specific recognized justifiable reasons to quash the subpoena. Motion should be denied as one without merit and frivolous.

ARGUMENT

1. Defendant starts by stating that the hearing would require him to interrupt his duties in order to appear for an administrative hearing in Fulton County GA. It is noteworthy, that this statement comes on the heels of his extended 17 day Hawaiian vacation, which cost U.S. taxpayers 4 million dollars. Mr. Obama has earned a dubious distinction as a Vacationer in Chief, Tourist in Chief, Partier in Chief and a Golfer in Chief due to his endless vacations, parties and rounds of golf. Considering all of the above, it is not too much to ask for Mr. Obama to show up once at a hearing and present his original identification records, which were not seen by anyone in the country yet.

2. Significance of the trial in Fulton county GA has repercussions on the nation as a whole as surely finding of this trial will affect decisions around the country, as other states will need to ascertain, whether to allow Mr. Obama on the ballot as an eligible candidate.

3. Defendant states that he "made document available to the general public by placing it on his web site". Since when is an image posted on line, on a website, represents a document, admissible in a court of law or anywhere else for that

matter? When U.S. citizens are applying for their passports or drivers licenses, do they tell the clerk at the counter to look on their website at something they drew two days ago and posted yesterday? One can post a laundry list on a website and call it a birth certificate. To get a job as a janitor at the White House or anywhere else for that matter you need to show actual documents. Unfortunately, in most states in the nation and in the federal government there is a loop hole, whereby individuals running for high offices such as Senator or President can get into such office without ever showing any documents. It is an honor system, it was presumed, that one would not dare to run for such a high office without possessing necessary documents. However, as was shown in exhibits provided with the First Amended Complaint, there is evidence of fraud and forgery in Mr. Obama's identification records, such as his alleged long form birth certificate and Social Security number, which necessitates the need for subpoena for a certified long form birth certificate to be produced by Mr. Obama as well as the original to be produced by the Director of Health of Hawaii Loretta Fuddy.

3. Motion to quash is vague and ambiguous. It is titled "Motion to Quash Subpoenas" plural, however in the body of the motion he talks about "a subpoena", singular. Mr. Obama does not represent any witnesses; his attorney does not represent any witnesses. No other party filed any motions to quash. If any of the witnesses do not want to appear at trial, it is up to them to file motions to quash. As

a matter of fact, recently retired Senior Deportation Officer with the Department of Homeland Security John Sampson and licensed investigator Susan Daniels, witnesses mentioned by Mr. Obama, stated that they want to testify to evidence of fraud in Mr. Obama's identification records, as they feel this is the most important matter of the national security. Plaintiffs' attorney has already spent thousands of dollars on airfare and hotel reservations in order to bring the witnesses to trial. Defendant did not provide any specific justification for quashing subpoenas served on other parties.

4. Mr. Obama was properly served with the subpoena in the state of Georgia, through his attorney Mr. Michael Jablonski, located at 260 Brighton road , N..E. Atlanta, GA 30309. Unless the city of Atlanta recently seceded from the state of Georgia, Mr. Obama was served in the state of Georgia, subpoena is procedurally valid and Mr. Obama needs to comply, appear at trial and produce the documents requested.

5. Mr. Obama availed himself to the jurisdiction of the state of Georgia and this court by virtue of submitting his candidacy for presidency. Being a candidate is time consuming. Mr. Obama recently embarked on a campaign bus tour across Mid West and he is flying around the country attending multiple fundraisers in order to build a cash war chest for the general election. Campaigning consists of not only meeting with large donors and seeking donations, but also of proving that

one is eligible for the position and has proper identification papers, particularly since no one saw the original documents and an alleged copy is deemed to be a forgery. It is reasonable to seek subpoena for Mr. Obama to appear at trial and provide identification papers. Most of the arguments in this motion are redundant and were brought in Defendant's motion to dismiss. It was denied. Defendant is under jurisdiction of the court and agreed to service of process in the state of Georgia through his attorney, who is located in Georgia. Service of subpoena was proper and valid.

6. Rules of the administrative court of GA state:

616-1-2-19

(1) Subpoenas may be issued which require the attendance and testimony of witnesses and the production of objects at depositions or hearings provided by these Rules...

616-1-2-19

(5) A subpoena may be quashed by Administrative law Judge if it appears that the subpoena is **unreasonable or oppressive or that the objects sought are irrelevant, immaterial or cumulative and unnecessary** to a party's preparation and presentation of its position or that **basic fairness dictates that subpoena should not be enforced...** (Emphasis added) Ga. Comp. R and regulations 616-1-2-.19(5)

Subpoena, served on Mr. Obama through his attorney is attached as Exhibit1.

It requests any and all certified birth records, certified long form birth certificate, certified school/university registration records, certified immigration/naturalization records, certified passport records and redacted certified SS-5 application under the names Barack(Barry) Soetoro, Barrack (Barry) Soebarkah and Barack (Barry) Obama and any and all combination of thereof and any other names used.

First, let's look at the names. Plaintiffs provided the court with recently released passport records of Barack Obama's mother, Ann Dunham (Obama) Soetoro (Exhibit 2). In her passport records Barack Obama was listed under the last name Soebarkah. In south Asia it is common to create blended names. Apparently his mother and Indonesian step father blended his first name Barack and his step father's last name and created a blended last name, Soebarkah. In his school registration #203 from Assissi School in Jakarta Indonesia he is listed under the last name Soetoro. Nobody ever saw any identification documents of Barack Obama, and we do not even know if Barack Obama is his legal name. It is not unreasonable, irrelevant, immaterial, cumulative, unfair or oppressive to seek to see identification papers to ascertain, if there is a legal entity Barack Obama, to ascertain, whether a man, who seeks to be on the ballot is Barack Obama.

b. The issue of Obama's eligibility was never adjudicated on the merits. As eligibility questions were raised and polls were showing that some 70% of voters doubted his eligibility, in April of 2011 Mr. Obama posted on the internet, what he claimed to be a copy of his long form birth certificate. Affidavits by Felicito Papa (Exhibit 4), Douglas Vogt and Paul Ireby attested to the fact, that according to their experience in the field of Adobe Illustrator, Typesetting and scanning, what was posted on the Internet, was not a copy of a document, but a forgery, created by cutting and pasting parts of different documents and filling in the blanks with computer graphics. Mr. Obama and White House counsel Kathy Ruemmler refused to present for examination the certified copy allegedly obtained in Hawaii. Director of Health of Hawaii refused to produce for examination the original document and nobody even knows whether the alleged 1961 original aged document even exists. If it existed, there was no reason to create a computer generated forgery. As such it is reasonable to seek from the defendant Mr. Obama to provide a valid certified copy of the long form birth certificate and to subpoena from the state of Hawaii the original document for examination. Moreover, Mr. Obama has posted his alleged birth certificate on mugs and T-shirts; he taunted the plaintiffs and their attorney. After he posted his alleged long form birth certificate on line, on mugs and T-shirts, he cannot claim privacy, department

of Health cannot claim privacy, it is not unreasonable, unfair, cumulative, oppressive, immaterial, or unnecessary to subpoena production of a certified copy of the long form birth certificate in lieu of the alleged copy made public and in light of the reports of the alleged copy being a forgery.

c. Considering the fact that in his Indonesian school records, Mr. Obama is listed as an Indonesian National, it is reasonable to subpoena his Immigration/Naturalization records and passport records. If indeed he came back from Indonesia as an Indonesian national and had to go through immigration/naturalization proceedings, he would be a naturalized citizen, not natural born and would not qualify for the position of the U.S. President, as the U.S. President is supposed to be Natural born. Similarly, it is reasonable to subpoena his school registration records, as those would reflect his legal name and citizenship. As such, immigration records, passport records and school registration records are not immaterial, unnecessary, cumulative, oppressive, unfair, unreasonable or irrelevant to be requested in the subpoena.

d. Lastly, as Mr. Obama published his tax records, he did not flatten the PDF file. His full Social Security number became available to the public, which was a Connecticut Social Security number, even though Mr. Obama was never a resident of CT and the number was never assigned to Barack Obama according to E-Verify and SSNVS. Individuals, who are natural born citizens,

have no problem obtaining a valid Social Security number from the state, where they reside. Lack of a valid Social Security number is evidence of identity fraud. As such, subpoena of a redacted SS-5 is not immaterial, irrelevant, oppressive, cumulative, unreasonable, irrelevant, unnecessary or unfair.

Based on all of the above, all the documents requested in the subpoena were properly requested and there are no grounds to quash the subpoena, seeking production of the above documents.

7. Most of the motion to quash contains irrelevant, impertinent, inflammatory and prejudicial material, which has nothing to do with the motion to quash the subpoena and was brought improperly, with the sole purpose of obfuscating the issues and prejudicing the court against the Plaintiffs and their attorney.

Defendant is bringing unrelated cases. It is, suffice to say, that not one single eligibility case was heard on the merits. Not one single judge around the nation ruled that Barack Obama is a natural born citizen. Not one single judge around the nation saw Obama's long form birth certificate, not one single judge ruled that Barack Obama has a valid long form birth certificate, not one single judge ruled that Barack Obama has a valid Social Security number. Not one single judge ruled that Barack Obama is indeed his legal name. Not one single judge ruled that the person residing in the White House is indeed

Barack Obama. All of the cases brought after the 2008 election were dismissed on technicality: due to lack of jurisdiction, lack of standing or court's desire to abstain from hearing the issue. Previous cases were adjudicated after the election and judges did not want to overturn the results of the election. Current case is different in that it is brought as a ballot challenge; it is being heard before the primary, before Mr. Obama's name is on the ballot. Defendant is bringing forward the fact that Mr. Obama was elected and confirmed in 2008. This is irrelevant. We are not in 2008. We are in 2012. Since 2008 a lot of information became available, which showed forgery and fraud in Mr. Obama's records.

An old axiom states, if you don't like the message, kill the messenger. The defense engaged in attacking the Plaintiffs' counsel. This motion is not about the Plaintiffs' counsel. This motion is about the subpoena. Were the documents properly requested in the subpoena? The defense was supposed to address each document requested and show with specificity, why there is legal basis to quash this particular document. Defendant failed to do so, as the documents requested were relevant, material, reasonable, necessary, not cumulative, not oppressive and do not violate the notion of fairness. Gratuitous attack on Plaintiffs' counsel, bringing unrelated cases and irrelevant matters in the motion to quash was unethical and sanctionable.

CONCLUSION

The subpoena served on Defendant was proper, documents requested not irrelevant, immaterial, unreasonable, oppressive, and cumulative and did not violate the notion of fairness. As such the Motion to Quash Subpoena served on the Defendant should be denied.

Proof of service

I, Orly Taitz, ESQ attest that I served this Opposition to Motion to Quash Subpoena on the defendant on 01.19.2012 through his attorney at Michael.Jablonski@comcast.net

/s/ Dr. Orly Taitz, ESQ

IN THE OFFICE OF STATE ADMINISTRATIVE HEARINGS
STATE OF GEORGIA

Farrar, Roth, Lax, Judy, MacLeran,
Petitioner,

v.

Obama, Respondent.

Docket No.:
OSAH-1215136-60 MALIHI

SUBPOENA

TO: Mr. Barack Hussein Obama
c/o Michael Jablonski, ESQ
260 Brighton Rd NE
Atlanta, GA 30309

YOU ARE HEREBY COMMANDED, to appear in court on behalf of ☐ Petitioner x ☐

Respondent to be:

☐ Sworn as a Witness

☒ Produce the Document on the Attached List:

Any and all certified birth records, certified long form birth certificate, certified school/university registration records, certified immigration/naturalization records, certified passport records and redacted certified SS-5 applications under the names Barack (Barry) Soetoro, Barack (Barry) Soebarkah, Barack (Barry) Obama and any and all combinations of thereof and any other names used.

The court date, time and location are:

DATE: January 26

TIME: 9 am

LOCATION: Administrative Court, state of GA, Fulton County Justice Center Building, 161 Pryor Str., Courtroom G-40 Atlanta, GA 30303, Hon Michael Malihi presiding

You are required to attend from day to day and from time to time until the hearing is completed or you have been released by the judge.

HEREIN FAIL NOT UNDER PENALTY OF LAW BY AUTHORITY OF THE ASSIGNED JUDGE.

Michael M. Malihi

Michael M. Malihi
Deputy Chief Judge

IF YOU HAVE QUESTIONS, CONTACT:	PROOF OF SERVICE
<p>Name: Orly Taitz, ESQ Attorney for Petitioners</p> <p>Telephone: 949-683-5411</p> <p>This section must be completed by the person issuing the subpoena.</p>	<p>This subpoena was served on: 01.06.2012</p> <p><input type="checkbox"/> personally X <input checked="" type="checkbox"/> by registered or certified mail <input type="checkbox"/> by delivery to a commercial delivery company for statutory overnight delivery by:</p> <p>Telephone:</p> <p>* A copy of the return receipt for registered or certified mail or a copy of the receipt provided by the commercial delivery company must be attached if not personally served.</p> <p>* This section must be completed by the person issues the subpoena.</p>

OFFICE OF STATE ADMINISTRATIVE HEARINGS
STATE OF GEORGIA

DAVID FARRAR,
LEAH LAX,
CODY JUDY,
THOMAS MALAREN,
LAURIE ROTH,

Plaintiffs,

v.

BARACK OBAMA,

Defendant.

Docket Number: OSAH-SECSTATE-CE-
1215136-60-MALIHI

Counsel for Plaintiffs: Orly Taitz

Counsel for Defendant: Michael Jablonski

DAVID P. WELDEN,

Plaintiff,

v.

BARACK OBAMA,

Defendant.

Docket Number: OSAH-SECSTATE-CE-
1215137-60-MALIHI

Counsel for Plaintiff: Van R. Irion

Counsel for Defendant: Michael Jablonski

CARL SWENSSON,

Plaintiff,

v.

BARACK OBAMA,

Defendant.

Docket Number: OSAH-SECSTATE-CE-
1216218-60-MALIHI

Counsel for Plaintiff: J. Mark Hatfield

Counsel for Defendant: Michael Jablonski

KEVIN RICHARD POWELL,

Plaintiff,

v.

BARACK OBAMA,

Defendant.

Docket Number: OSAH-SECSTATE-CE-
1216823-60-MALIHI

Counsel for Plaintiff: J. Mark Hatfield

Counsel for Defendant: Michael Jablonski

ORDER ON MOTION TO QUASH SUBPOENAS

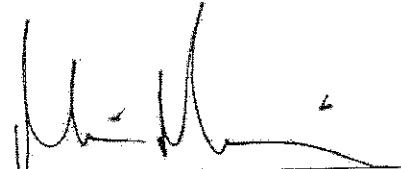
Defendant, President Barack Obama, a candidate seeking the Democratic nomination for the office of the President of the United States, has filed a motion to quash the subpoena compelling his attendance at the hearing on January 26, 2012.

In support of his motion, Defendant argues that "if enforced, [the subpoena] requires him to interrupt duties as President of the United States" to attend a hearing in Atlanta, Georgia. However, Defendant fails to provide any legal authority to support his motion to quash the subpoena to attend. Defendant's motion suggests that no President should be compelled to attend a Court hearing. This may be correct. But Defendant has failed to enlighten the Court with any legal authority. Specifically, Defendant has failed to cite to any legal authority evidencing why his attendance is "unreasonable or oppressive, or that the testimony... [is] irrelevant, immaterial, or cumulative and unnecessary to a party's preparation or presentation at the hearing, or that basic fairness dictates that the subpoena should not be enforced." Ga. Comp. R. & Regs. r. 616-1-2-.19(5).

Defendant further alludes to a defect in service of the subpoena. However, the Court's rules provide for service of a subpoena upon a party, by serving the party's counsel of record. Ga. Comp. R. & Regs. r. 616-1-2-.19(4). Thus, the argument regarding service is without merit.

Accordingly, Defendant's motion to quash is denied.

SO ORDERED, this the 20th day of January, 2012.



MICHAEL M. MALIHI, Judge

Peter A. Stokes, Esq.
Begley Law Firm, PLLC
P.O. Box 287
Jackson, MS 39205
(601) 969-5545 (office)
(601) 969-5547 (fax)
pete@begleylawfirm.com
www.begleylawfirm.com

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Dr Orly TaitzESQ29839 Santa Margarita pkwy, ste 100Rancho Santa Margarita, CA
92688ph 949-683-5411 fax949-766-7603 orlytaitzesq.com

--

Dr Orly TaitzESQ29839 Santa Margarita pkwy, ste 100Rancho Santa Margarita, CA
92688ph 949-683-5411 fax949-766-7603 orlytaitzesq.com

6 attachments — Download all attachments
MS Opposition to motion in limine.doc
61K View Download
MS Complaint Thomas v Hosemann.pdf
307K View Download
Farrar Order on Motion to Dismiss.pdf
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Opposition to Motion to Quash Subpoena.pdf
141K View Download
Subpoena Barack Obama.pdf
219K View Download
Farrar Order on Motion to Quash Subpoenas.pdf
618K View Download

Fwd: Fw: Pro Hac Vice Motion, Verified Application, Letters, MS Bar Receipt
Inboxx

Orly Taitzfor filing ----- Forwarded message ----- From: Orly Taitz <orly.tai...
Apr 14 (4 days ago)
for filing ----- Forwarded message ----- From: Orly Taitz <orly.tai...

Orly Taitz orly.taitz@gmail.com
Apr 14 (4 days ago)

to me

----- Forwarded message -----
From: Orly Taitz <orly.taitz@gmail.com>
Date: Sat, Mar 31, 2012 at 12:55 PM
Subject: Re: Fw: Pro Hac Vice Motion, Verified Application, Letters, MS Bar Receipt
To: Sam Begley <sbegley1@bellsouth.net>
Cc: Justin Matheny <JustinMatheny@ago.state.ms.us>, HAROLD PIZZETTA
<HPIZZ@ago.state.ms.us>, cjrcoleman@hotmail.com, Orly Taitz
<orly.taitz@gmail.com>

Dear judge Coleman and counsel,
please find
1. opposition to motion in limine
2. motion in limine by the plaintiff
3. opposition to pro hac vice
4. exhibits

Respectfully,

Dr. Orly Taitz

On Fri, Mar 30, 2012 at 11:17 AM, Sam Begley <sbegley1@bellsouth.net> wrote:

----- Original Message -----
From: Peter A. Stokes
To: Sam Begley
Sent: Friday, March 30, 2012 1:07 PM
Subject: Pro Hac Vice Motion, Verified Application, Letters, MS Bar Receipt

Dr. Orly Taitz, ESQ
29839 Santa Margarita, ste 100
Rancho Santa Margarita, CA 92688
p. 949-683-5411 f 949-766-7603
orly.taitz@gmail.com

IN THE FIRST CIRCUIT COURT
HINDS COUNTY
STATE OF MISSISSIPPI

FILED
APR 19 2012
BARBARA DUNN, CIRCUIT CLERK
BY *[Signature]* D.C.
2c

Taitz) Hon. R. Kenneth Coleman presiding
)
V) Case #2012-107
)
Democratic Party of Mississippi)
Secretary of State of Mississippi)

**RESPONSE TO LETTER BY SAMUEL BEGLEY DEMANDING TO
WAIVE FOR ATTORNEY SCOTT J. TEPPER THE REQUIREMENT TO
DISCLOSE PUBLICLY HIS ADDRESS IN HIS PRO HAC VICE
APPLICATION.**

California attorney Scott J. Tepper cannot have it both ways. He publicly disclosed a lot of his personal information when he gave an interview in regards to his hobby of fox hunting (See Exhibit 1). While Mr. Tepper enjoys playing the role of a blueblood, flaunting his foxhunting skills and his ex-wife being a British actress related to some blue bloods, at the same time Mr. Tepper was no gentleman and viciously attacked and defamed attorney Orly Taitz for bringing to court evidence of Barack Obama using a forged birth certificate and a stolen Social Security number. This imaginary blue blood has been hiding behind a pseudonym Sterngard

Friegen and behind a picture of an angry boy flipping a finger at attorney Orly Taitz. (Exhibit 2, 3) Some of Tepper's cohorts and comrades commissioned a painter to paint inappropriate pornographic nude paintings of Orly Taitz and posted those all over the internet, in the local papers and sent them to her three children. Privacy of Orly Taitz was invaded time and again and she was viciously slandered and attacked. Mr. Tepper should not get any waivers or preferential treatment from the usual pro hac vice process. Impartiality of the court demands the same consideration to Mr. Tepper as given to other attorneys. Additionally, Mr. Tepper's only goal is to turn this case into a circus show of attacks on Taitz and divert the attention of the court from the real problem, the fact that we have a criminal in the White House, who is usurping the U.S. Presidency, while using a forged birth certificate and a stolen Social Security number, and who intends to do it for four more years with the help of corrupt bureaucrats, attorneys and some judges. Tepper's involvement makes him a potential additional defendant to be added in the first amended complaint, and as such he also has a conflict of interest with the client he intends to represent and cannot be their attorney with or without pro hac vice.

/s/Dr. Orly Taitz, ESQ

I, Orly Taitz, attest that on 04.05.2012 I served the defendants with the response to the letter seeking to waive Pro hac vice requirements.

/s/ Orly Taitz

from a supporter Larry Wilson
Submitted on 2012/04/04 at 7:27pm

I don't understand the reluctance to include the address. You simply google and find this lawyer riding a horse at 5547 Paradise Valley, Hidden Hills, CA 818-594-0750. It says his law firm gave about 5 thousand to the Democratic Party for Obama. Why keep it a secret from a judge? Sounds like this Tepper fellow is a Harvard Marxist who loves being rich? Geez, what is the big deal?

Letter to Judge Coleman-Verified Application Deficiency-4-4-12

**Scott J Tepper, M.F.H.
Honorary Whipper-In**

Scott began foxhunting in 1975. He has been a Master of Red Rock Hounds from 1986 to present and was a Master of West Hills Hunt from 1989 to 1995. Scott has been active in the roles of the Pacific District Director of the Master of Foxhounds Association from 1992 to 2000 and the Chairman Insurance & Liability Committee of the Masters of Foxhounds Association from 1991 to 2001.

Scott married the English actress Serena Scott Thomas, who foxhunts with the Blackmore & Sparkford Vale in Dorset, England..

Scott graduated Harvard Law School (1971) and U.C.L.A. (1967) and is an attorney with and founding partner of Garfield Tepper & Raskin, Los Angeles.

Lynn's take on Scott - "Nobody on this planet is a better Jt. than Scott. He saved me from going to jail back in 1988 and continues to save the hunt with every new crisis. Thank you, Scott!"

From Wikipedia, the free encyclopedia
Jump to: navigation, search

Serena Harriet Scott Thomas (born 21 September 1961) is an English actress.

[edit] Family and personal

Scott Thomas was born in Nether Compton, Dorset. Her mother, Deborah (née Hurlbatt), was brought up in Hong Kong and Africa, and studied drama before marrying Scott Thomas' father.^[1] Her father, Lieutenant Commander Simon Scott Thomas, was a pilot for the British Royal Navy who died in a flying accident in 1964.^{[2][3][4]} She is the younger sister of actress Kristin Scott Thomas, the niece of Admiral Sir Richard Thomas (who was Black Rod in the House of Lords), and a more distant great-niece of Captain Scott, the ill-fated explorer who lost the race to the South Pole. Her surname is an amalgam of the surnames of those two families. The Scott Thomases also trace their lineage to the 2nd Earl of Godolphin, the owner of the famous Godolphin Barb.^[citation needed]

She was married to Scott J. Tepper from 1996 to 2004.^[citation needed]

0 #



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DISBARMENT WATCH

 by [hitch](#) » Sat Mar 20, 2010 5:48 pm

From Orly's

Watergate started with tracing money to robbers...

Posted on | March 20, 2010 | No Comments

Please help me find out if someone is paying attorney Scott J. Tepper from Garfield and Tepper in Santa Monica to file countless frivolous complaints against me, with the only goal of harassing me and keeping fraud committed by Obama concealed and not prosecuted. It is hard for me to believe that no one is paying this attorney to waste hours of his time on writing frivolous complaints about me. We need to find out who is behind him. Please follow the money trail



hitch

Posts: 160


Joined: Mon Oct 05, 2009 5:52 pm

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DISBARMENT WATCH

 by **Sterngard Friege** » Sat Mar 20, 2010 5:58 pm

By parity of reasoning -- who's paying Taitz?

 ... She's *still* licensed to practice ~~dentistry~~ real estate law?



Sterngard Friege

Posts: 3739

Joined: Wed Aug 05, 2009 12:32 am

Location: Malibu, California

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DISBARMENT WATCH

by [MaineSkeptic](#) » Sat Mar 20, 2010 6:18 pm

*hitch wrote:*From Orly's

Watergate started with tracing money to robbers...

Posted on | March 20, 2010 | No Comments

Please help me find out if someone is paying attorney Scott J. Tepper from Garfield and Tepper in Santa Monica to file countless frivolous complaints against me, with the only goal of harassing me and keeping fraud committed by Obama concealed and not prosecuted. It is hard for me to believe that no one is paying this attorney to waste hours of his time on writing frivolous complaints about me. We need to find out who is behind him. Please follow the money trail

There is a Watergate analogy here, but Orly's got it wrong.

Nixon's supporters used to argue that the scandal was being promoted by Nixon's enemies, and of course they were right. That's what enemies are for, and all politicians have them.

What did Nixon in was that the allegations had substance; and as the public got to see some of the evidence, there was a juggernaut for resolution that could not be stopped.

Orly is making the mistake of obsessing over the sources of the complaints. What she should be thinking about is their substance. That's what's going to do her in.



[MaineSkeptic](#)

Posts: 1410

Joined: Thu Mar 19, 2009 2:48 pm

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DISBARMENT WATCH

by AuBricker » Sat Mar 20, 2010 6:36 pm

I was recently writing to an online friend explaining that, although I possess a JD, I know less about law than any practicing attorney because they, in addition to also possessing a JD, actually practice law, something I have never done unless you include drafting the terms of divorce that ended my first marriage.

I was about to press the "send" button, but then modified my message to read "I know less about law than any practicing attorney (except Orly Taitz)." At least I filed my divorce papers properly, and my divorce occurred before I entered law school.

I hope the California Bar soon makes it unnecessary for me to add "except Orly Taitz" to such remarks. My Blog on Education, Politics, Law, Religion and Books Can Be Found at <http://larcheslynnie.blogspot.com/>.

AuBricker

Posts: 259

Joined: Wed Nov 18, 2009 7:32 pm

Location: Chicago IL

- [Private message](#)
- [Website](#)
- [MSNM/WLM](#)

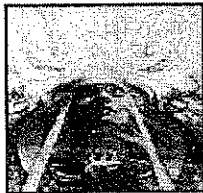
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DISBARMENT WATCH

by peredur » Sat Mar 20, 2010 6:39 pm

I have noticed a lot of "Who is this person?" threads on her website, lately. I wonder if she is looking for real names so she can file suits? I notice one of the problems Larry Sinclair had was the inability to name names of anonymous posters, and the inability to go fishing for them as part of the process. "And the women come and go, Talking of Michelangelo, Something something, Till we drown." Boomer Bible - Book of Psomethings 23:13-16



peredur

Posts: 103

Joined: Thu Mar 04, 2010 2:37 am

Location: Josey, Wales

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DISBARMENT WATCH

 by **Jay Bea** » Sat Mar 20, 2010 9:19 pm

*Sterngard Fiegen wrote:*By parity of reasoning -- who's paying Taitz?

Good question, especially since she apparently doesn't find it believable that anyone else would exert effort without getting paid.




Jay Bea

Posts: 261
Joined: Mon Sep 28, 2009 1:06 pm
Location: East Coast, USA
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DISBARMENT WATCH

 by **bogus info** » Sun Mar 21, 2010 7:14 am

This is an interesting article.

Ethics And The Pro Bono Attorney

Lawyers who do pro bono work must be familiar with legal and ethical rules governing their behavior

By Wendy Patrick Mazzarella

One of the most valuable contributions to the legal profession a lawyer can make is devoting some of his or her time to handling cases pro bono. Pro bono representation can be rewarding personally and also valuable professionally for attorneys who are seeking to gain experience and visibility in the legal community. When attorneys are well versed in the legal and ethical rules governing the profession in their jurisdiction, such representation is a win-win for both lawyer and client.

For the attorney who is in over his or her head, however, pro bono representation can be a dangerous venture for everyone involved. Attorneys handling cases pro bono must therefore be familiar with the important legal and ethical rules governing their behavior, and must also have sufficient experience in representing the type of case they are undertaking. This article will examine the applicable rules in California and under the ABA.

more here: [http://www.calsb.org/state/calbar/calba ... tegory=YES](http://www.calsb.org/state/calbar/calba...tegory=YES)

emphasis original

bogus info

Posts: 6219

Joined: Fri Feb 13, 2009 9:19 pm

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